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PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

CABLEC CONTINENTAL CABLES COMPANY
MARION, INDIANA
IND 062 803 697

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	IND 062 803 697
Date Prepared	:	March 11, 1993
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EXECUTIVE SUMMARY

Resource Applications, Inc. (RAI) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Cablec Continental Cables Company (CCCC) facility in Marion, Indiana. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

The CCCC facility manufactures insulated wires and cables for the electrical industry. The facility generates and manages the following waste streams, and the waste codes are those assigned by the facility: paint sludge (F002/D001); waste stoddard solvent (D001); spent toluene (F005); waste paint (D001); spent perchloroethylene (F002); spent methyl ethyl ketone (MEK) (F005); waste mineral spirits (D001); spent xylene (F003); waste hydrochloric acid (D002); and lead-contaminated waste (D008).

The processes at the CCCC facility include: deliming, which generates spent acid; painting, which generates waste paint; and lubricating solution, which generates spent oils. The facility has operated at its current location since 1980. The facility occupies 37 acres in a mixed-use area and employs about 310 people. The facility's regulatory status is a generator and treatment, storage, and disposal (TSD) facility.

Since 1980, this facility has undergone several changes in ownership. The latest change occurred on December 28, 1990, when Cablec Industrial Cable Company was merged with Cablec Corporation. Cablec Corporation merged with BRIntec Systems Corporation and was renamed BICC Cables Corporation. Cablec Continental Cables Company (CCCC) is a division of BICC Cables Corporation (BICC). BICC is the owner and CCCC is the operator.

Soil contamination occurred at the Hazardous Waste Drum Storage Area (SWMU 1). The closure sampling results indicated that soil contamination exists in the fill material surrounding the concrete pad. It is the intention of CCCC to close the Hazardous Waste Drum Storage Area (SWMU 1) and revert to less than 90-day accumulator status. CCCC has made arrangements with off-site (commercial) TSD facilities to ensure that hazardous wastes are periodically removed. There were also three releases which occurred in 1981 at the Wastewater Treatment Unit (SWMU 4).

The PA/VSI identified the following 13 SWMUs at the facility:

Solid Waste Management Units

1. Hazardous Waste Drum Storage Area
2. Hazardous Waste Storage Area
3. Empty Drums and Battery Storage Area
4. Wastewater Treatment Unit
5. Satellite Baghouses
6. Satellite Lead Dross Drums
7. Lead Dross Drum Storage Area
8. Roll-Off Container for Waste Storage
9. Lead Filter Drum Storage Area
10. Satellite Waste Paint/Solvent Sludge Drums
11. Copper Mud/Spent Oil Drum Storage Area
12. Satellite Waste Wire Drums
13. Waste Asbestos Storage Area

No areas of concern were identified at the facility.

The potential for release of hazardous constituents to ground water is moderate from this facility. Contamination has been identified in on-site soils at the Hazardous Waste Drum Storage Area (SWMU 1) and the surface geology consists of glacial till and urban land. There are city wells and a pump house approximately 500 yards north and downgradient of the facility. Only one well is presently active. The Hazardous Waste Drum Storage Area (SWMU 1) consists of a fenced-in 50-foot by 50-foot concrete pad with a curb around the perimeter. The pad shows signs of a spill and has some cracks on the surface. There are also signs of etching. Since 1988, CCCC has been attempting to close the Hazardous Waste Drum Storage Area (SWMU 1). SWMU 1 currently cannot meet the requirements of a RCRA clean closure. CCCC submitted a modified closure plan to Indiana

Department of Environmental Management (IDEM) on September 12, 1991, that is currently being reviewed.

The potential for release of hazardous constituents to surface water and air is moderate for the Hazardous Waste Drum Storage Area (SWMU 1). Contamination by volatile organic compounds and metals has been identified in on-site soils at the Hazardous Waste Drum Storage Area (SWMU 1), and the Mississinewa River is located at the perimeter of the facility. In general, all of the SWMUs have adequate containment, except for the Hazardous Waste Storage Area (SWMU 2) which is on soil with no secondary containment.

Residential areas lie within 1/8-mile of the plant production area. A chain-link fence surrounds the entire perimeter of the plant and storage areas of the facility. Ground water is used as a drinking water supply. The nearest drinking water well is located 500 yards north and downgradient of the facility. The nearest surface water body, the Mississinewa River, is located on the south and east property line of the facility. Sensitive environments are not located on site. There are no wetland areas, critical habitats, or state parks located within 2 miles of the facility.

RAI recommends that the facility should continue remediation to meet RCRA clean closure requirements for the Hazardous Waste Drum Storage Area (SWMU 1) and since the Hazardous Waste Storage Area (SWMU 2) is on soil, with no secondary containment, soil sampling should be performed to determine if past releases occurred.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC) received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. Resource Applications, Inc. (RAI), TES 9 Team member, provided the necessary assistance to complete the PA/VSI activities for the Cablec Continental Cables Company (CCCC) facility.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the CCCC facility in Marion, Indiana. The PA was completed on December 10, 1991. RAI gathered and reviewed information from the Indiana Department of Environmental Management (IDEM) and from EPA Region 5 RCRA files. RAI also reviewed relevant publications from the U.S. Department of Agriculture (USDA) Soil Conservation Service (SCS), State of Indiana Department of Natural Resources (IDNR), Indiana Geological Survey, Division of Water, and the National Climatic Data Center (NCDC). The VSI was conducted on December 11, 1991. It included interviews with CCCC facility representatives and a walk-through inspection of the facility. Thirteen SWMUs were identified at the facility.

RAI completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and 17 inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C. Results of the soil sampling for the Hazardous Waste Drum Storage Area (SWMU 1) are included in Attachment D.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

The CCCC facility is located at 440 East 8th Street in Marion, Grant County, Indiana (latitude 40° 02' 010" N and longitude 85° 37' 30" W), as shown in Figure 1. The facility occupies approximately 37 acres in a mixed-use area (industrial/commercial).

The CCCC facility is bordered on the north by commercial/residential areas, on the west by a railroad yard, and on the east and south by the Mississinewa River. The facility is owned by BICC Cables Corporation, with corporate headquarters at One Crestfield Avenue, West Nyach, New York 01004-1100.

2.2 FACILITY OPERATIONS

The CCCC facility manufactures insulated wires and cables for the electrical industry. The basic process consists of (1) wire drawing (reducing the diameter of the initial raw product to some specification); (2) stranding (twisting the drawn wires together to meet other requirements); (3) insulating the wire as required; and (4) shipping out the finished product.

The facility has operated at its current location since 1980 and employs about 310 people. Prior to 1980 the facility was owned by Anaconda-Ericsson, Inc. (A-E, Inc.). The facility dates back to the early 1900's. The area was farmland before the early 1900's. The facility was always a wire and cable company. The main plant covers an area of 600 feet by 810 feet with a small main office building next to it. The parking lot is located at the northwest corner of the main building and covers an area of approximately 800 feet by 132 feet. It is located between Shunk Street and the railroad tracks. The entire facility is fenced-in with a security headquarters at the main plant entrance. Facility SWMUs are listed in Table 1 and shown on Figure 2.

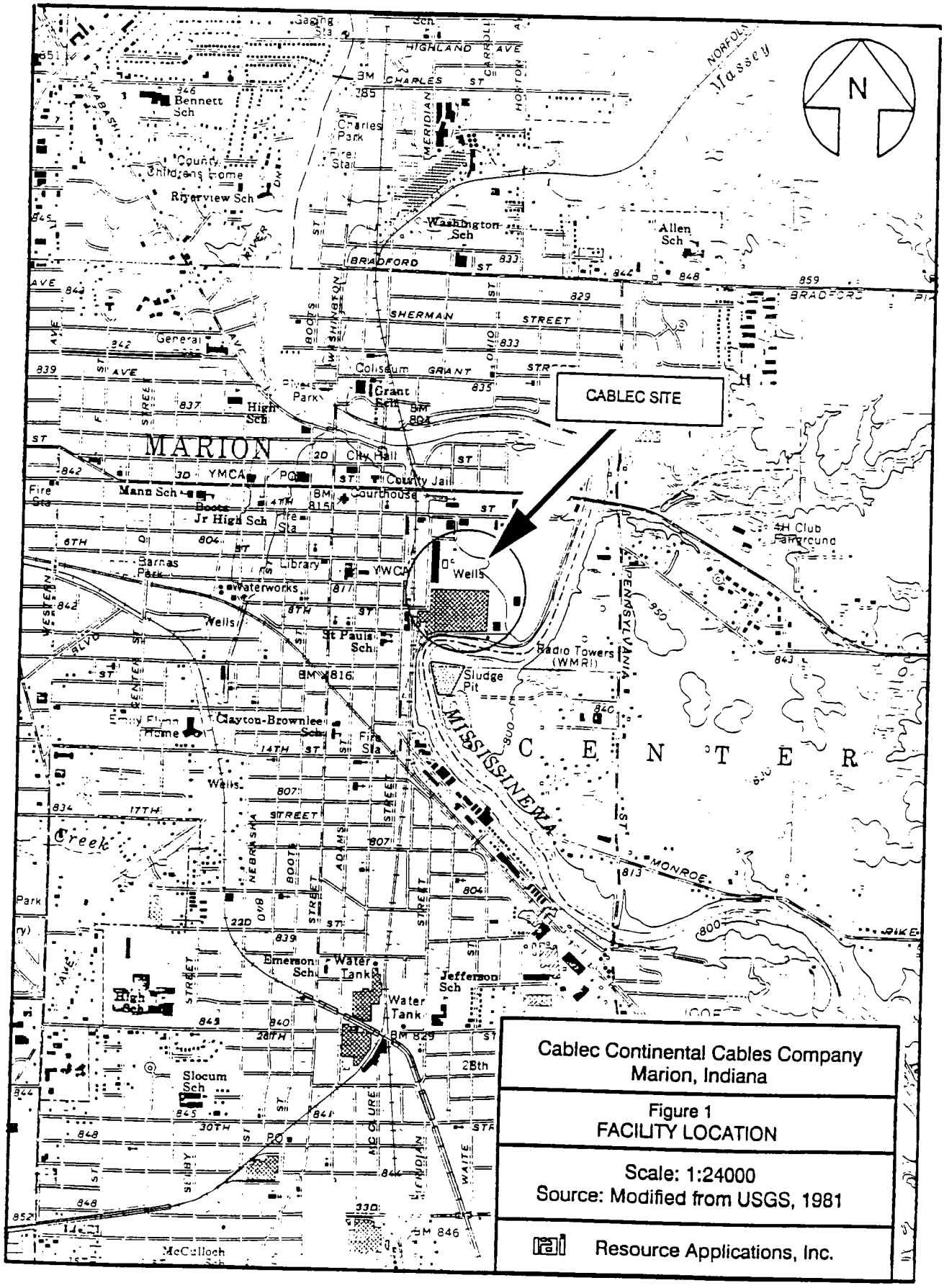

CABLEC SITE
MARION
CENTER
N
Cablec Continental Cables Company
Marion, Indiana
Figure 1
FACILITY LOCATION
Scale: 1:24000
Source: Modified from USGS, 1981
Resource Applications, Inc.

TABLE 1

SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Hazardous Waste Drum Storage Area	Yes	Active, in the process of closing
2	Hazardous Waste Storage Area	No	Inactive
3	Empty Drums and Battery Storage Area	No	Active
4	Wastewater Treatment Unit	No	Active
5	Satellite Baghouses	No	Active
6	Satellite Lead Dross Drums	No	Active
7	Lead Dross Drum Storage Area	No	Active
8	Roll-Off Container for Waste Storage	No	Active
9	Lead Filter Drum Storage Area	No	Active

Note:

* A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B Permit Application.

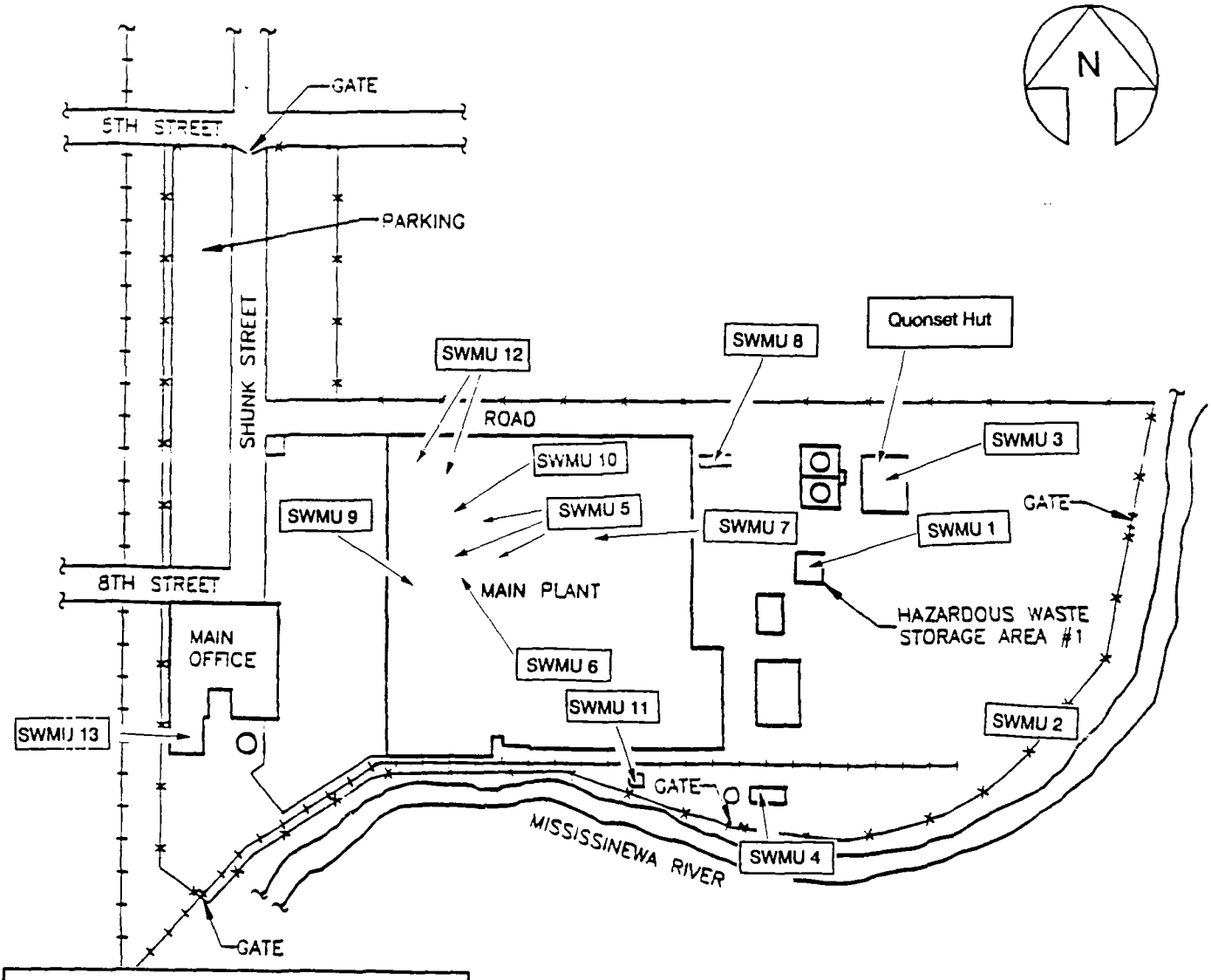
TABLE 1 (continued)

SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
10	Satellite Waste Paint/ Solvent Sludge Drums	No	Active
11	Copper Mud/Spent Oil Drum Storage Area	No	Active
12	Satellite Waste Wire Drums	No	Active
13	Waste Asbestos Storage Area	No	Inactive

Note:

* A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B Permit Application.



Solid Waste Management Units (SWMU)

1. Hazardous Waste Drum Storage Area
2. Hazardous Waste Storage Area
3. Empty Drums and Battery Storage Area
4. Wastewater Treatment Unit
5. Satellite Baghouses
6. Satellite Lead Dross Drums
7. Lead Dross Drum Storage Area
8. Roll-Off Container for Waste Storage
9. Lead Filter Drum Storage Area
10. Satellite Waste Toluene/Paint Sludge Drums
11. Copper Mud/Spent Oil Drum Storage Area
12. Satellite-Waste Wire Drums
13. Waste Asbestos Storage Area

Cablec Continental Cables Company
Marion, Indiana

Figure 2
FACILITY LAYOUT/SWMU LOCATIONS

Not Drawn to Scale
Source: CCCC, 1991b

Resource Applications, Inc.

The following ownership history was taken from CCCC Modified Closure Plan, Revision 0, dated September 6, 1991. Since 1980, this facility has undergone several changes in ownership. From the early 1900's until 1980, the facility was owned by The Anaconda Company, which also manufactured wires and cables. In approximately May 1980, Anaconda-Holdings, Inc. acquired the facility from The Anaconda Company. On July 28, 1980, Anaconda-Holdings, Inc. changed its name to Anaconda-Ericsson, Inc. (A-E, Inc.) On July 1, 1983, A-E, Inc. changed its name to Ericsson, Inc. On February 15, 1985, Anaconda Acquisition Company (a subsidiary of Cablec Corporation) acquired the facility from Ericsson, Inc. and was renamed Anaconda Power Cable Co. (APCC). On February 11, 1987, APCC was renamed Cablec Industrial Cable Co. Finally, on December 28, 1990, Cablec Industrial Cable Co. was merged into Cablec Corporation, which was merged into BRIntec Systems Corporation, which was renamed BICC Cables Corporation. Cablec Continental Cables Company (CCCC), the facility operator, is a division of BICC Cables Corporation (CCCC, 1991c).

The Hazardous Waste Drum Storage Area (SWMU 1) is a concrete pad which was constructed in December 1980. Its dimensions are 50 feet by 50 feet with an 8-inch high concrete berm. This unit has been in continuous use as a drum storage area since its completion. Prior to 1980, SWMU 1 was used to manage wastes, but without the concrete pad. The Hazardous Waste Storage Area (SWMU 2) was used to store hazardous waste for less than 90 days from 1980 through 1985.

This unit is located adjacent to a railroad siding at the southeast section of the property. Since 1985, this area has been used to store raw materials and finished products, and has not been used to accumulate or store hazardous waste. A 5,000-gallon storage tank was listed in the original Part A permit application, but was never installed on-site (A-E, Inc. 1982). Table 1 indicates the RCRA status of each SWMU.

2.3 WASTE GENERATING PROCESSES

Waste generating processes at the facility are discussed below and solid waste streams are summarized in Table 2. The first step in wire cable production is wire drawing which consists of drawing various diameter wires through dies, thus reducing the diameter to a specified size. A

TABLE 2

SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit*
Copper Mud/NA**	Wire Drawing Lubricant	SWMU 11
Lead-Contaminated Waste/ D008	Insulation Manufacture	SWMUs 4, 5, 6, 7, 8, and 9
Spent Xylene/F003	Anti Stick (Insulation)	SWMUs 1 and 10
Waste Paint Sludge/ F002/D001	Drum Bottoms	SWMUs 1, 2, and 10
Waste Stoddard Solvent/ D001	Parts Cleaning	SWMU 1
Spent Toluene/F005	Cable Wash/ Paint Dilution	SWMUs 1, 2, and 10
Waste Paint/D001	Paint Clean Up	SWMUs 1 and 2
Waste Hydrochloric Acid/ D002	Deliming (Heat Exchanger)	SWMU 1
Spent Perchloroethylene/ F002	Cable Wash	SWMU 1
Spent Methyl Ethyl Ketone (MEK)/F005	Cleaning Motors	SWMU 1
Waste Mineral Spirits/ D001	Paint Thinner	SWMU 1
Waste Drums/NA	Raw Materials/Mobile Equipment	SWMU 3
Used Batteries/D008	Mobile Equipment	SWMU 3
Waste Water Drawing Solution/NA	Wire Drawing	Taken off-site from process
Waste Kolene Salts/NA	Wire Drawing	Taken off-site from process

TABLE 2 (continued)

SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit*
Waste Copper Wire/NA	Wire Drawing	SWMU 12
Spent Oil/NA	Gear Boxes/Lift Trucks	SWMU 11
Waste Asbestos/NA	Boiler Room	SWMU 13

Notes:

* Primary management unit refers to the SWMU that currently manages or formerly managed the waste.

** Nonapplicable (NA) designates nonhazardous waste.

drawing solution consisting of 95 percent water and 5 percent Apex 99R (animal fat) is used in this process. Some of the copper from the wire becomes mixed with the solution. This material (sediment) is called copper mud. The copper mud is scooped from the bottom of the solution tank and collected and stored in 55-gallon drums in the Copper Mud/Spent Oil Drum Storage Area (SWMU 11). The copper mud is then auctioned to the highest-bidding reclaimer and transported off-site for recycling by that reclaimer. The accumulation of the copper drawing solution ranges from 50 to 100 tons per month as approximated from manifests from 1979 to 1987. The wastewater drawing solution is pumped into tank trucks approximately once a year and transported to a treatment center for treatment and discharge into the storm sewer (CCCC, 1992a). The transporter and treatment center is Heritage Environmental Services, Inc., Indianapolis, Indiana (CCCC, 1992a). Kolene salts were at one time used in a tinning operation where the copper wire received a coat of tin on its exterior after the wire drawing operation. The kolene salts were used as a catalyst in the melting process of the tin (CCCC, 1992b). This waste was transported by the Industrial Waste Disposal Co. (IWDC) to the Four County Sanitary Landfill in Fulton County (IDEM, 1979). This process begins after the wire drawing ends.

The second step in the production process is stranding, which consists of twisting the wires together, thus producing a cable. This process does not produce any hazardous waste.

The third step in the production process is insulating the wire (covering the wire with a non-conductor of electricity). The insulation is manufactured by CCCC by mixing a compound together which contains color chips and lead. Some spent xylene is generated during the insulation process (CCCC, 1992b). Some of the wire may be covered with more than one layer of insulation. The xylene is used in between layers as a cleaner and an anti-stick material. The spent xylene is gathered in drip pots along the process and then transferred to a 55-gallon drum, one of the Satellite Waste Paint/Solvent Sludge Drums (SWMU 10). When full, this drum is delivered to the Hazardous Waste Drum Storage Area (SWMU 1) (CCCC, 1992b). Waste lead is generated from this process and is collected from several different operations: lead dust from the handling of the lead before it is placed into a melting pot furnace is collected in Satellite Baghouses (SWMU 5), lead dross from the melting pot furnace is skimmed off and placed in Satellite Lead Dross Drums (SWMU 6), after which these drums are taken to the Lead Dross Drum Storage Area (SWMU 7), when full. A waste lead compound is also generated from the compound used for the insulation manufacture. This waste is

taken to the Roll-Off Container for Waste Storage (SWMU 8). Some lead leaches out from the insulation during the water cooling process of the insulation. The water from the cooling process is circulated through lead filters (inside the plant), through a cooling tower (outside the main plant), and then to the Wastewater Treatment Unit (SWMU 4) (just west of the cooling tower). The Lead Filter Drum Storage Area (SWMU 9) is located in the main building, as seen in Figure 2. The Wastewater Treatment Unit (SWMU 4) is used to treat the water chemically for hardness and to adjust the pH. This is a closed- loop system (CCCC, 1992a). Some of the insulated wire has a lead-extruded jacket encompassing it for curing the rubber insulation. The lead-jacketed cable is passed through an autoclave furnace where steam is added for curing, after which water sprays are used for cooling. The wastewater is then recirculated through a closed-loop system which is the same as described above (CCCC, 1992b).

The other wastes generated in the third step are as follows, and the waste codes are those assigned by the facility: paint sludge waste (F002/D001), waste stoddard solvents (D001), spent toluene (F005), waste paint (D001), and waste hydrochloric acid (D002). The waste paint contains small amounts of chromium, cadmium, and barium. Waste paint sludge (F002/D001) is formed in the bottom of paint drums. The waste stoddard solvent (D001) is from the parts cleaning operation. Spent toluene (F005) is from cable washing and paint dilution. The waste paint (D001) is from cleanup. All of these wastes are stored in 55-gallon drums. The spent toluene (F005) and paint sludge (F002/D001) are accumulated in Satellite Waste Paint/Solvent Sludge Drums (SWMU 10), located at various points throughout the plant. Waste hydrochloric acid (D002) is generated from deliming equipment such as heat exchangers. After these drums are full, they are delivered to the Hazardous Waste Drum Storage Area (SWMU 1). The chemicals that were used in the process before CCCC acquired the company were perchloroethylene, MEK, and mineral spirits. Wastes from the use of these chemicals were also taken to SWMU 1. The spent perchloroethylene (F002) was from cable washing, spent MEK (F005) was from drum motor cleaning, and waste mineral spirits (D001) were from paint thinning. The annual amount of waste hauled away in 1985 was 4,950 pounds of waste stoddard solvent (D001), 2,650 pounds of spent perchloroethylene (F002), 825 pounds of spent MEK (F005), 3,710 pounds of waste mineral spirits (D001), and 65 pounds of waste hydrochloric acid (D002). The waste from the Hazardous Waste Drum Storage Area (SWMU 1) is transported off-site by Doug Warner, Inc. to Petro-Chemical Processing of Detroit.

From 1980 to 1985, the Hazardous Waste Storage Area (SWMU 2) was used to store waste paint (D001) and spent toluene (F005) for less than 90 days (CCCC, 1992b). Since 1985, this area has been used to store raw materials and finished products, and has not been used to accumulate or store hazardous waste. The Empty Drums and Battery Storage Area (SWMU 3) is a Quonset hut-type building used for the storage of empty drums that contain raw materials for wire production and other material including dead batteries from mobile electric equipment. The empty drums are returned to the raw material manufacturers and the batteries are removed off-site to recycling operations. The dead batteries are transported by Pagasoraus Reclaiming Co. in Marion, Indiana (CCCC, 1992b). Fifteen Satellite Waste Wire Drums (SWMU 12) are located at various points throughout the facility to collect waste copper wire. When full, the drums are removed to an off-site wire reclaimer.

The approximate quantities for principal wastes for the year of 1991, per phone conversation with Brad Rusk of CCCC on December 19, 1991 are as follows: waste lead contaminated compound (D008), 180,000 pounds per year; spent toluene (F005), 2,000 gallons per year; waste paint (D001), 16 55-gallon drums per year; waste stoddard solvent (D001), one 55-gallon drum per year; and waste hydrochloric acid (D002), 12 55-gallon drums per year (CCCC, 1991e).

On January 10, 1985, A-E, Inc. submitted a letter of request to the Indiana State Board of Health (ISBH) for disposal of asbestos (AWCC, 1985). The asbestos was stored in the Waste Asbestos Storage Area (SWMU 13), in the boiler room located in the southern portion of the office building. On January 31, 1985 the ISBH granted permission to dispose of 15 containers (approximately 885 pounds) of asbestos on a one-time-only basis (ISBH, 1985). The spent oil, which is stored in the Copper Mud/Spent Oil Drum Storage Area (SWMU 11), is collected from the various machine operations from mobile trucks used for inside plant operations.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils, at the CCCC facility. Three spills have been documented. These spills occurred on August 31, 1981, November 25, 1981, and December 30, 1981.

The first spill (release), which occurred on August 31, 1981, was reported by phone to Mr. Jim Knoy of the Division of Water Pollution Control, ISBH on September 1, 1981. Mr. Knoy visited the site on September 2, 1981. This spill occurred at the Wastewater Treatment Unit (SWMU 4). The spill was due to an oversight in that the make-up water used in the wire drawing process was turned on to replenish the system, and not turned off until the solution had overflowed. This occurred at the water tower on the east side of the Wastewater Treatment Unit (SWMU 4) building. An estimated 300 to 500 gallons of solution overflowed to the outside. This solution consisted of 95 percent water and 5 percent Apex 99R. Most of the solution was vacuumed into drums in the solution room and sawdust and oil sorbent dams were used to absorb and contain the material. No solution reached the Mississinewa River. To correct and prevent this problem from occurring again, plans were made to construct overflow sumps to prevent spills from reoccurring. Level control and alarm systems were also part of this plan. Valves controlling make-up water would be locked out and controlled by the Process Engineering Group.

Before the above corrective action was taken, a second spill occurred. The second spill (release), which occurred on November 25, 1981 between 5:00 and 6:00 a.m., was reported by phone and letter, the same day, to Mr. Kip Dowers of the Division of Water Pollution Control, ISBH. The occurrence was an accidental drawing solution spill similar to the first spill (95 percent water and 5 percent Apex 99R). The spill was due to a flange gasket separation on the suction side of a recirculating pump. Approximately 100 gallons of solution ran out of a building doorway onto the ground adjacent to a rail siding. This release also occurred at the water tower on the east side of the Wastewater Treatment Unit (SWMU 4) building. A cleanup action was taken and most of this solution was vacuumed into drum containers. No solution was discharged into the Mississinewa River. To correct and prevent this problem from occurring again the same plans were made as discussed for the first spill. The prevention plan has been implemented but the date as to when is not known (CCCC, 1992a).

The third spill (release) was discussed by phone on December 30, 1981, with Mr. Jim Knoy of the Division of Water Pollution Control, ISBH. The following is a brief description of the Marley Tower overflow spill. The Marley Tower is part of the Wastewater Treatment Unit (SWMU 4) located outside of the main plant which receives water from the steam extruder, for cooling. The water is used in the autoclave (for cooling) in the wire curing process. The tower receives the water

for cooling before it is sent to the Wastewater Treatment Unit (SWMU 4) for pH adjustment and water softening. It was determined that the tower water level was low because someone had turned on the make-up water (fresh city water) bypass and neglected to monitor the level and it overflowed. This system has automatic level controls and a high level alarm, but for reasons unknown, the system failed to function. The overflow was detected at 2:30 p.m. and it was estimated that 100 to 3,000 gallons had overflowed. The treatment for this release was a purchased liquid blend of 10 percent chromic acid, 10 percent zinc chloride and 80 percent water. There is no evidence that any of the material reached the Mississinewa River (CCCC, 1992a).

CCCC is in the process of closing the Hazardous Waste Drum Storage Area (SWMU 1). On February 28, 1990, Heritage Remediation/Engineering, Inc. (HR/E) was retained to implement the soil sampling. Figure 1 in Attachment D presents a diagram of the Hazardous Waste Drum Storage Area (SWMU 1) and shows the soil sampling locations. All sample locations were approximately 3 feet from the containment side of the pad. Soil samples at all locations were collected by HR/E at 6-inch intervals to a depth of 24-inches. As shown in Table 1 in Attachment D, concentrations of seven constituents (barium, chromium, lead, benzene, tetrachloroethane, 1,1,1-trichloroethene, and chloromethane) exceeded the clean closure requirements which were submitted by CICC and approved by IDEM for this closure. The low levels of volatile organic compounds at various locations suggested surficial contamination possibly from "drum waste" and/or normal drum handling practices around the storage pad, and possibly degradation products. CICC accepted HR/E's recommendation to remediate this area by removing and disposing of the contaminated soil. To accomplish this, it is necessary to obtain additional samples to conduct the analytical tests necessary to demonstrate compliance with RCRA Land Disposal Restrictions for F001-F005 solvents and metals. Once it was demonstrated that the waste could be land disposed, CICC proceeded to complete the necessary forms and paperwork to obtain IDEM approval for disposal at a licensed hazardous waste TSD facility. That approval was received on November 20, 1990 (CCCC, 1991a).

On December 18, 1990, approximately 55 cubic yards of soil were excavated. Soil was removed from each area at which the initial unit sampling had shown results which exceeded the closure standards (i.e. points 1, 2, 3, 5, 6, and 7). The limits of the excavation were approximately 3 feet horizontal from the pad and 1.5 feet deep. Table 2 in Attachment D presents a summary of the results of the analytical tests. The sampling had also shown results which exceeded the closure

standards. On February 6, 1991 a second excavation took place at the areas of concern. Approximately 30 cubic yards of soil material was removed and disposed of at a licensed hazardous waste landfill (CCCC, 1991a).

Table 3 in Attachment D presents the results of analytical testing for the constituents of concern at each location. Total lead, total barium, and tetrachloroethane concentrations were found to exceed the closure standards (CCCC, 1991a).

On December 28, 1990, CICC was changed to CCCC. Because the results of the third sampling event were not favorable, CCCC intends to pursue additional remediation of the soil. CCCC, requested 180 days from March 11, 1991 to complete soil removal, disposal, and to analyze the samples (CCCC, 1991a).

On April 22, 1991, IDEM replied to CCCC letter dated March 11, 1991, and approved the request for a 180-day extension (IDEM, 1991a).

On September 12, 1991, CCCC submitted a Modified Closure Plan to IDEM, which was prepared by Environmental Resources Management, Inc. (ERM) for their review (CCCC, 1991d).

2.5 REGULATORY HISTORY

A-E, Inc. submitted a Notification of Hazardous Waste Activity to EPA on August 11, 1980 (A-E, Inc., 1980a). The application listed the following wastes: F005 and F017. A-E, Inc. submitted a subsequent Notification of Hazardous Waste Activity to EPA on October 31, 1980 (A-E, Inc., 1980b). The facility submitted a RCRA Part A permit application on November 16, 1980 (A-E, Inc., 1980c). This application listed the following process codes and capacities: S01-container storage (10,000 gallons) and S02-tank storage (5,000 gallons). The application listed the following wastes: F002, F003, F005, F017, D001, P117, and D002. A-E, Inc. submitted a revision to the Part A permit application to change its waste codes, on February 24, 1982 (A-E, Inc., 1982). The application listed the following wastes: F002, F003, F005 and F017. A-E, Inc. submitted a revision to the Part A permit application on February 4, 1983, (A-E, Inc., 1983). This revision, was to add waste code number F001. The following information was also changed: (1) Hazardous Waste Storage

Area (SWMU 2) was removed, (2) Hazardous Waste Drum Storage Area (SWMU 1) was decreased from 50-foot by 150-foot in size to a 50-foot by 50-foot area, (3) the F017 waste was deleted, and (4) an increase in D001 generation rate and a decrease in F002 generation rate. Anaconda Power Cable Co. (APCC) submitted a revision to the Part A Permit application on March 21, 1985, (APCC, 1985). This revision was submitted to EPA on March 21, 1985 to transfer the Part A permit from A-E, Inc. to Anaconda Power Cable Co. The 5,000-gallon hazardous waste storage tank process code (S02) was not included on the forms; however, all of the other information remained the same. Cablec Industrial Cable Co. (CICC) submitted a revised Notification of Hazardous Waste Activity to EPA on August 10, 1987 (CICC, 1987a). The application listed the following wastes: F001, F002, F003, F005, U159, U220, and U239. CICC submitted a revision to the Part A permit application on October 22, 1987 (CICC, 1987b). The application listed the following wastes: F001, F002, F003, F005, D001 and D002. CICC submitted a revision to the Part A permit application on February 25, 1988, (CICC, 1988a). This third revision, was submitted to IDEM to remove the F001 waste stream and decrease the estimated annual generation rate of the D001 waste stream.

It is the intention of CCCC to close the Hazardous Waste Drum Storage Area (SWMU 1) and revert to less than 90-day accumulator status. CCCC has made arrangements with an off-site (commercial) TSD facility to ensure that hazardous wastes are periodically removed. In no event will hazardous wastes be stored for longer than 90 days.

Since 1988, CICC has been working toward closure of the Hazardous Waste Drum Storage Area (SWMU 1). The closure plan was submitted in lieu of a Part B Permit application (CICC, 1988b). CICC intends to be regulated as a generator only, accumulating waste for less than 90 days upon certification of closure. On March 11, 1991, CCCC submitted a letter to IDEM requesting a 180-day extension to complete soil removal, disposal, and to analyze additional confirmation samples (CCCC, 1991a). On April 22, 1991, IDEM responded to the CCCC letter of March 11, 1991, and granted an approval for the extension (IDEM, 1991c). On September 12, 1991, CCCC submitted a modified closure plan to IDEM for their review (CCCC, 1991d).

On August 14, 1986, IDEM conducted a financial assurance record review of APCC (IDEM, 1987). The review indicated that the facility was not in compliance with the Indiana RCRA financial assurance rules (Notice of Violation, V-462). On March 7, 1991, IDEM submitted a letter to Cablec

Corporation, New York, NY, stating that during a record review it had been determined that CICC had achieved compliance with the terms of the Agreed Order issued to CICC on January 4, 1991 (IDEM, 1991b). The order was in reference to a 1990 Demonstration of Financial Liability (IDEM, 1991a). On December 28, 1990, CICC was merged with Cablec Corporation, and then merged with BRIntec Systems Corporation, and is now known as BICC Cables Corporation. BICC is the owner and CCCC is the operator (CCCC, 1991c). On August 24, 1990, IDEM conducted another record review of the facility, which revealed a violation of the financial liability test regulations under 329 Indiana Administration Code (IAC) 3. As a result, a proposed Agreed Order was issued to CCCC on September 3, 1991 (IDEM, 1991d). It is not known whether the violation has been resolved.

The facility currently operates as a large-quantity generator storing waste for less than 90 days; however, they are regulated as a storage facility since they are still in the process of going through closure.

This facility has no history of air permit compliance problems or odor complaints from area residents. The facility is required to have a National Pollutant Discharge Elimination System (NPDES) permit. They were authorized to discharge to the Mississinewa River in accordance with effluent limitations, monitoring requirements and other conditions as set forth in the permit. Their volume is tied to production and is monitored by the municipality every 6 months and by the facility every 2 weeks. They monitor for lead and chromium. They are presently in the process of renewing their NPDES permit (CCCC, 1992a).

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the CCCC facility.

2.6.1 Climate

The climate in Grant County is continental, with wide variations in temperature between summer and winter. The average daily temperature is 49.6°F. The lowest average daily temperature is 15.8°F in January. The highest average daily temperature is 84.3°F in July (NOAA, 1980).

The total annual precipitation for the county is 36.73 inches. The 1-year, 24-hour maximum rainfall is 5.65 inches (NOAA, 1980). The mean annual lake evaporation for the area is about 32 inches (USDC, 1968).

The prevailing wind is from the southwest. Average wind speed is highest in spring at 12 miles per hour from the southwest (USDA, 1986).

The average seasonal snowfall is about 25 inches. The greatest snow depth at any one time during the period of record was 11 inches. On the average, 17 days of the year have at least 1 inch of snow on the ground. The average humidity in midafternoon is about 60 percent. The growing season for most crops usually falls in April through September. In 2 years out of 10, the rainfall in April through September is less than 19 inches (USDA, 1986).

2.6.2 Flood Plain and Surface Water

The CCCC facility is located in a 100-year flood plain and 500-year flood plain area (Marion, Indiana, City Engineer, 1991). The nearest surface water body, Mississinewa River, is located next to the property line south and east of the facility and is used for recreational purposes. This surface water body discharges to the Mississinewa Reservoir and then into the Wabash River.

2.6.3 Geology and Soils

The geology beneath the CCCC facility consists of Silurian bedrock overlain by approximately 100 feet of Quaternary unconsolidated deposits. The bedrock is composed of limestone, dolomite, and an argillaceous dolomite of the Wabash and Pleasant Hills Formations. Because the CCCC facility is situated near the hinge of the Cincinnati Arch, the bedrock is nearly flat-lying in the vicinity of the site. The unconsolidated deposits consisting of glacial till and outwash deposits of pre-Wisconsinan and Wisconsinan age. Pre-Wisconsinan till consisting of loam and sandy loam of the Jessup Formation directly overlies the bedrock. Wisconsinan till comprised of silty clay and clay of the Trafalgar and Lagro Formations overlies the pre-Wisconsinan tills. East of the CCCC facility, the Wisconsinan till forms a northwest-southeast trending moraine. The Wisconsinan till in the vicinity of Marion, Indiana, was deposited by the Huron-Erie lobe of the Wisconsinan glacier. A

narrow bank of Wisconsinan sand and gravel outwash deposits overlie the till in the vicinity of the CCCC facility. These outwash deposits are, in part, sediments of the Atherton Formation (Hartke, 1982).

The soils in the site vicinity consist of areas of urban land intermingled with areas of nearly-level and gently-sloping, well-drained Fox soil. The Fox soil is moderately deep, over sand and gravelly, coarse sand. Urban land makes up 60 to 85 percent of the mapped areas. In a typical area, streets, parking lots, shopping centers, buildings and other structures cover the surface, so that identification of the soil series is not feasible (USDA, 1986).

In a typical profile of the Fox soil, the surface layer is brown silt loam about 9 inches thick. The subsoil is about 26 inches thick. The upper part is dark yellowish brown, friable clay loam, and the lower part is brown and dark reddish brown, friable, gravelly, sandy clay loam. The underlying material to a depth of 60 inches is yellowish brown, very gravelly, coarse sand. In some places, the surface layer, the subsoil, or both, contain more clay. In other areas, the soil is shallower with calcareous sand and very gravelly, coarse sand. The Fox series consist of well-drained soils on terraces. These soils formed in loamy sediments that are moderately deep over very gravelly, coarse sand. Permeability is moderate in the subsoil and rapid or very rapid in the underlying materials. Slope ranges from 0 to 15 percent.

2.6.4 Ground Water

No site-specific information was available for the CCCC facility. The closest active well to the CCCC facility is approximately 500 yards north of the main plant, downgradient. The capacity of the well is 1,400 gallons per minute. The aquifer for this well is a finger of the Jedys River Valley aquifer system. The aquifer thickness is 20 to 50 feet. The depth to the water table (static level) is 57 feet. There are three other wells approximately 1 mile southwest of CCCC, in the Marion downtown area. The aquifer thickness of these wells is 20 to 30 feet at a depth of 90 to 110 feet below the surface. These wells are also used for drinking water (City Water Works, 1991).

Because of rather complex geologic conditions, yield and depths of water wells vary widely in the Grant County area. Well depths (bottom of well) range from less than 50 feet to nearly 400 feet.

About two-thirds of the wells are completed in sand and gravel. Where good gravel formations are present, wells rated in excess of 250 gallons per minute may be developed (INDNR, 1968).

2.7 RECEPTORS

The CCCC facility occupies 37 acres in a mixed-used area in Marion, Indiana. Marion has a population of about 40,000.

The CCCC facility is bordered on the north by a commercial area, on the west by railroad, and on the south and east by the Mississinewa River. The nearest school, Jones Middle School, is located about 1 mile northeast of the facility (Marion, Indiana, City Engineer, 1991).

The facility is surrounded by a chain-link fence. Access to CCCC is restricted to one fenced and guarded entrance. The facility has a security team which patrols the facility 24 hours a day.

The nearest surface water body, the Mississinewa River, is located on the south and east property line of the facility.

Ground water is used as a drinking water supply. The nearest drinking water well is located 500 yards north of the facility. This well is located downgradient of the facility. Sensitive environments are not located on-site. There are no wetland areas, critical habitats, or national or state parks located within 2 miles of the facility (Marion, Indiana, City Engineer, 1991).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 13 SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented release, and RAI observations.

SWMU 1 **Hazardous Waste Drum Storage Area**

Unit Description:

The Hazardous Waste Drum Storage Area is located above-ground on the east side of the main plant (outside). The unit is used for the storage of drums of hazardous waste. The unit was identified as a 50-foot by 120-foot storage area in the original Part A application dated November 16, 1980. The unit actually measures 50 feet by 50 feet. This area was built on top of approximately 6 feet of fill that includes rubble, ash, cinders, slag, and rock. Based on the surrounding topography, naturally occurring soil would be expected to be present underneath the 6-foot layer of fill. The fill material extends west toward the plant and approximately 30 feet from the south, east, and the north sides of the unit.

The unit is made of an 8-inch thick reinforced concrete pad and is constructed with an 8-inch high berm around its perimeter. The pad is fenced-in around its perimeter with a 6-foot cyclone-type fence, and has a double gate on the west side (see Photograph No. 1). The maximum inventory of waste stored in the unit is indeterminate; however, it is less than the design capacity identified in the Part A Permit application (10,000 gallons).

Date of Startup:

The unit's concrete pad was constructed in December 1980, and has been in continuous use as a drum storage area since its completion. Waste has been stored for less than 90 days since December 5, 1985 (CICC, 1987a).

Date of Closure: The unit is in the process of closure. The most recent documentation is a letter dated September 12, 1991, including a Modified Closure Plan to IDEM from CCCC (CCCC, 1991d).

Wastes Managed: This unit manages the following wastes: waste paint sludge (F002/D001), waste stoddard solvent (D001), spent toluene (F005), waste paint (D001), spent xylene (F003), waste hydrochloric acid (D002), and waste lead (D008). Before 1985, CCCC managed the following wastes: spent perchloroethylene (F002), spent MEK (F005), and waste mineral spirits (D001). Wastes from this unit are picked up for off-site disposal. These wastes were not generated prior to 1980.

Release Controls: The concrete pad is constructed with an 8-inch high berm around its perimeter and a drain with a shutoff valve located at the southeast corner. Eventually the pad area is to be closed-in, or sheltered, with a roof. CCCC has not determined the type of shelter.

History of Documented Releases: The closure sampling results indicated that soil contamination exists in the fill material surrounding the concrete pad (CCCC, 1991a). Table 1 in Attachment D presents concentrations of seven constituents uncovered during the initial evaluation (CCCC, 1991a). A comprehensive sampling and analysis plan will be implemented as part of the closure activities to determine the horizontal and vertical extent of contamination and to allow for an informed decision regarding clean-up levels and remediation techniques (CCCC, 1991a).

Observations: The unit (at the time of the VSI) contained 55-gallon drums of spent toluene and waste lead filters (See Photographs No. 1, 2, and 3). The pad contained many cracks, some of which appeared to have been sealed. The area in the southwest quadrant of the pad appeared

	discolored (reddish), indicating a spill had occurred (See Photographs No. 2 and 3). Photographs No. 4 and 5 show some of the remediation trenches.
SWMU 2	**Hazardous Waste Storage Area**
Unit Description:	The Hazardous Waste Storage Area is located outside of the plant on the southeast part of the property, adjacent to the railroad tracks. The unit was used for storage of hazardous waste for less than 90 days. This unit measures approximately 200 feet by 120 feet.
Date of Startup:	The unit began operation in 1980.
Date of Closure:	Since 1985, this unit has been used to store raw materials and finished products, and has not been used to accumulate or store hazardous waste.
Wastes Managed:	The unit managed a few 55-gallon drums, at any one time, which consisted of waste paint (D001) and spent toluene (F005). These wastes were not generated prior to 1980.
Release Controls:	Drums were stored on the ground and there were no release controls.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	At the time of inspection, there were no drums in this storage area (See Photograph No. 6).

SWMU 3	**Empty Drums and Battery Storage Area**
Unit Description:	This unit is located in a Quonset hut-type building which is used for storage of junk, such as broken machinery, old process machinery parts, and other miscellaneous equipment. The building is located on the northeast part of the property and measures approximately 200 feet by 200 feet.
Date of Startup:	The date of startup is unknown, but the unit may have been used since change of ownership in 1980.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages empty raw material drums and old batteries from forklift-type trucks.
Release Controls:	Wastes are stored inside, on a concrete floor.
History of Documented Releases:	No releases from this area have been documented.
Observations:	The area contained approximately 50 55-gallon drums and two large batteries. No evidence of release was noted (See Photograph No. 7).
SWMU 4	**Wastewater Treatment Unit**
Unit Description:	The unit is located in a separate building on the southernmost part of the property, between a railroad siding and the south fence. The Mississinewa River runs parallel (alongside) to the south and east fences. Photograph No. 8 shows the cooling tower for the Wastewater Treatment Unit. The unit consists of a water treatment

	building, two cooling towers (one on each side of the water treatment building) and a lead filtering area inside the plant (west side). The east cooling tower cools the wire drawing solution water and the west cooling tower cools the steam extrusion water. The treatment building treats the water from both cooling towers for pH adjustment and for hardness.
Date of Startup:	The date of startup is unknown, but it is estimated by facility representatives to be 1980.
Date of Closure:	The unit is active.
Wastes Managed:	This unit manages wastewater after pH adjustment and softening of the water.
Release Controls:	The unit is inside a building with a concrete floor.
History of Documented Releases:	There were three spills documented in August, November, and December of 1981. There were two spills from the east cooling tower and one spill from the west cooling tower. Future overflow prevention consisted of constructing overflow sumps, lockouts on make-up water controls and adding a level control and alarm system. The west tower already had an alarm system, but for some unknown reason, it did not function at that time (CCCC, 1992a). All spills were contained and cleaned up.
Observations:	This area appeared clean and well-kept. No evidence of a release was observed.

SWMU 5	**Satellite Baghouses**
Unit Description:	These baghouses are located in an area of the process production line which is utilized in the manufacture of the insulation. A compound is mixed, containing some lead in the formula. Waste lead is returned to a melting pot furnace, outside of the unit, for recycling. During the process, some lead dust is emitted to the atmosphere and then captured in vent hoods which direct the lead-ladened air to a baghouse-type filtering system. The lead is finally placed into 55-gallon drums located at the bottom of the baghouse. The drums rest on a concrete floor.
Date of Startup:	The date of startup is unknown, but it is estimated by facility representatives to be 1980.
Date of Closure:	The unit is active.
Wastes Managed:	This unit manages waste lead dust (D008).
Release Controls:	Wastes are inside, on a concrete floor.
History of Documented Releases:	No releases from this area have been documented.
Observations:	The baghouses are pieces of specifically-designed air pollution control equipment. The equipment seems to be well-maintained and no signs of releases were observed. Photograph No. 9, shows dust collection drums beneath the baghouse. No evidence of a release was observed.

SWMU 6	**Satellite Lead Dross Drums**
Unit Description:	The lead dross drums are located in the lead melting pot furnace area. The lead dross is generated from skimming the impurities off the top of the lead melting pot surface. These skimmings (lead dross) are then placed into a 55-gallon drum and covered with a wooden lid. The drum rests on a concrete floor.
Date of Startup:	The date of startup is unknown, but it is estimated by facility representatives to be 1980.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages waste lead dross (D008). When full, the drums are taken to the Lead Dross Drum Storage Area (SWMU 7).
Release Controls:	The drums are inside, on a concrete floor.
History of Documented Releases:	No releases from this area have been documented.
Observations:	The area around the Satellite Lead Dross Drums appears to be clean and well-kept. No signs of releases were observed. Photographs No. 10 and 11 show lead dross drums in the melting pot area.
SWMU 7	**Lead Dross Drum Storage Area**
Unit Description:	The Lead Dross Drum Storage Area is located in the plant, approximately 30 feet from the Satellite Lead Dross Drums (SWMU 6). The drums are stored on a concrete floor in an area away from the aisles where the moving equipment travels. The is no definite size to this area, except that it seems to store one drum at a time. It

	appears that there is enough space for several drums. These drums are from the filled Satellite Lead Dross Drums (SWMU 6) (see Photograph No. 12).
Date of Startup:	The date of startup is unknown, but it is estimated by facility representatives to be 1980.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages waste lead dross (D008). The waste from this unit is picked up for off-site disposal.
Release Controls:	The unit is inside, on a concrete floor.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This unit appears to be clean and well-kept. No sign of releases was observed.
SWMU 8	**Roll-Off Container-Waste Storage**
Unit Description:	The roll-off type container is approximately 30 cubic yards in capacity and is mainly used for storing lead-contaminated compound. Before this container is removed for off-site disposal it is properly covered to prevent any of the compound from falling out. The container rests on an outdoor asphalt drive area, on the northeast corner of the main plant (see Photograph No. 13).
Date of Startup:	The date of startup is unknown, but it is estimated by facility representatives to be 1980.
Date of Closure:	This unit is active.

Wastes Managed:	This unit manages waste lead compound (D008). The entire roll-off container is picked up for off-site disposal.
Release Controls:	The container is constructed of steel with seam-welded joints and is on an asphalt base.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This entire area appears to be clean and well-kept and the cover for the container appeared to be tied down securely. It was noticed that the labels of identification on the container were not dated. No evidence of a release was observed.

SWMU 9 **Lead Filter Drum Storage Area**

Unit Description:	This unit is located inside the main plant area (west side), next to the in-plant lead filter collection system which is a part of the Wastewater Treatment Unit (SWMU 4). The used lead filters are stored in 55-gallon drums and rest on the concrete floor. Upon removal, the drums are delivered to the Hazardous Waste Drum Storage Area (SWMU 1) (see Photograph No. 14).
Date of Startup:	The date of startup is unknown, but it is estimated by facility representatives to be 1980.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages waste lead filters (D008). The lead-laden filters are stored in 55-gallon drums, which are picked up for off-site removal.
Release Controls:	The unit is inside, on a concrete floor.

History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit appears to be clean and well-kept. No sign of releases was observed.
SWMU 10	**Satellite Waste Paint/Solvent Sludge Drums**
Unit Description:	These drums are located in the northwest portion of the main plant alongside, or close to, the production line. Spent toluene (F005), spent xylene (F003), and waste paint sludge (F002/D001) is collected from parts cleaning containers, cable washing, paint dilution, and insulation areas. The paint sludge and spent toluene are normally collected in 5-gallon buckets (spent toluene is sometimes pumped) and delivered to the 55-gallon drums using a funnel for transferring the waste into the drums (CCCC, 1992b). The spent xylene is collected in drip pots and delivered to an adjacent 55-gallon drum via a funnel. The drums rest on the concrete floor (see Photographs No. 15 and 16).
Date of Startup:	The date of startup is unknown, but it is estimated by facility representatives to be 1980.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages spent toluene (F005), waste paint sludge (F002/D001), and spent xylene (F003).
Release Controls:	The drums are inside, on a concrete floor.
History of Documented Releases:	No releases from this unit have been documented.

Observations:	The entire area where each of the satellite drums was located appeared clean and well-kept. No evidence of a release was observed.
SWMU 11	**Copper Mud/Spent Oil Drum Storage Area**
Unit Description:	The unit is located in a separate building on the south side of the main plant, between the railroad siding and the fence. The waste is stored in 55-gallon drums on skids, which rest on a concrete floor (see Photograph No. 17).
Date of Startup:	The date of startup is unknown, but it is estimated by facility representatives to be 1980.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous copper mud and oil. The copper mud is taken off-site for reclaiming. The spent oil is to be utilized in a waste fuel oil furnace. The furnace heats the building during the winter months.
Release Controls:	The drums are stored in a building, on a concrete floor.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The entire area appears to be clean and well-kept. No evidence of a release was observed.
SWMU 12	**Satellite Waste Wire Drums**
Unit Description:	There are about 15 drums located at various points throughout the plant. The waste wire consists mainly of cut-offs from the beginning and the end of various operations.

Date of Startup:	The date of startup is unknown.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages scrap copper wire. The drums are removed from their satellite areas directly off-site for wire reclamation.
Release Controls:	The waste drums are inside, on a concrete floor.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The separate collection areas appear to be clean and well-kept. No evidence of a release was observed.

SWMU 13 **Waste Asbestos Storage Area**

Unit Description:	The waste asbestos collected here is from a boiler room. The asbestos was originally used as an insulation covering over boiler exteriors and around steam pipes and other heated surfaces of boiler appurtenance (CCCC, 1992b). Waste asbestos was stored in containers prior to shipment off site.
Date of Startup:	The date of startup is unknown.
Date of Closure:	This unit was not used after mid-1985.
Wastes Managed:	This unit manages waste asbestos. The waste asbestos was removed and disposed of on a one-time-only basis. Fifteen containers of

	various sizes (885 pounds) were hauled away by Superior Sanction, Inc. (IDEM granted approval on January 31, 1985).
Release Controls:	Waste asbestos was stored in containers, inside, and on a concrete floor.
History of Documented Releases:	No releases for this unit have been documented.
Observations:	The area is clean and well-kept. No evidence of release was observed.

4.0 AREAS OF CONCERN

RAI identified no AOCs during the PA/VSI. Wastes are properly managed at the facility.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified 13 SWMUs and no AOCs at the CCCC facility. Background information on the facility's location, operations, waste generating processes, documented release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, release history, and observed condition, is discussed in Section 3.0. AOCs are discussed in Section 4.0. Following are RAI's conclusions and recommendations for each SWMU. Table 3 identifies the SWMUs at the CCCC facility and suggested further actions.

SWMU 1 **Hazardous Waste Drum Storage Area**

Conclusions: This unit stores various hazardous wastes on a 50-foot by 50-foot concrete pad with an 8-inch high berm. The pad contains a drain with a shut-off valve. There has been a past release to the soil which the facility is currently remediating as part of the RCRA closure. The soil contamination is believed to be due to drum washing which is no longer performed in the area. The potential for further release to ground water, surface water, and air is moderate.

Recommendations: The facility should continue remediation until they can reach closure requirements.

SWMU 2 **Hazardous Waste Storage Area**

Conclusions: This unit has never stored hazardous waste for more than 90 days. Since 1985, this area has been used to store raw materials and finished products and has not been used to accumulate or store hazardous waste. There have been no documented past releases from this unit. The unit was situated outdoors, on soil, with no secondary containment. The potential for future release to ground water, surface water, air, and on-site soil is low.

Recommendations: Soil sampling is recommended to determine if past releases occurred.

TABLE 3

SWMU SUMMARY

SWMU	Operational Dates	Evidence of Release	Suggested Further Action
1. Hazardous Waste Drum Storage Area	At least 1980 to Present	Ground contamination	Continue remediation until reach closure requirements.
2. Hazardous Waste Storage Area	At least 1980 to Present	None	Soil sampling is recommended at this time.
3. Empty Drums and Battery Storage Area	At least 1980 to Present	None	No further action is recommended at this time.
4. Wastewater Treatment Unit	At least 1980 to Present	None	No further action is recommended at this time.
5. Satellite Baghouses	At least 1980 to Present	None	No further action is recommended at this time.
6. Satellite Lead Dross Drums	At least 1980 to Present	None	No further action is recommended at this time.
7. Lead Dross Drum Storage Area	At least 1980 to Present	None	No further action is recommended at this time.
8. Roll-Off Container for Waste Storage	At least 1980 to Present	None	No further action is recommended at this time.

TABLE 3 (continued)

SWMU SUMMARY

SWMU	Operational Dates	Evidence of Release	Suggested Further Action
9. Lead Filter Drum Storage Area	At least 1980 to Present	None	No further action is recommended at this time.
10. Satellite Waste Paint/Solvent Sludge Drums	At least 1980 to Present	None	No further action is recommended at this time.
11. Copper Mud/Spent Oil Drum Storage Area	At least 1980 to Present	None	No further action is recommended at this time.
12. Satellite Waste Wire Drums	At least 1980 to Present	None	No further action is recommended at this time.
13. Waste Asbestos Storage Area	Unknown to 1985	None	No further action is recommended at this time.

SWMU 3 **Empty Waste Drums/Battery Storage**

Conclusions: This unit is located in a Quonset hut-type building used for junk storage which also contained several dozen empty, used drums (from raw material). The floor is concrete and the drums rest on wooden skids. The skids are resting directly on the concrete floor. The drums are to be returned to the original vendors. The batteries will be picked up for off-site lead recycling. There are no documented releases from this unit. The waste is in a building with a concrete floor. The unit has a low potential for release to ground water, surface water, air, and on-site soil.

Recommendations: No further action is recommended at this time.

SWMU 4 **Wastewater Treatment Unit**

Conclusions: The treatment unit is located in a separate building outside of the main plant with its cooling tower resting on the ground outside of the building. The unit has a low potential for release to ground water, surface water, air, and on-site soil. Past spills were cleaned up and the unit was redesigned to prevent spills.

Recommendations: No further action is recommended at the time.

SWMU 5 **Satellite Baghouses**

Conclusions: Lead is collected in these baghouses in the form of small particulates. This lead comes from mixing certain materials together, forming a special compound used in the manufacture of insulation for the wire. Some lead dust is also collected at the conveyer feed to the melting pot. Additional particulates are emitted from the exhaust vent at the melting pot furnace. There are no documented releases from this unit. The unit has a low potential for release to ground water, surface water, air, and on-site soil since the lead

is captured in a highly efficient baghouse collector (air pollution prevention) and then conveyed to 55-gallon drums which rest on a concrete floor.

Recommendations: No further action is recommended at this time.

SWMU 6 **Satellite Lead Dross Drums**

Conclusions: The lead dross drums are in the lead melting pot furnace area. The drums rest on the concrete floor. The skimmings are then placed in the 55-gallon drum. There are no documented releases from this unit. The unit has a low potential for release to ground water, surface water, air, and on-site soil.

Recommendations: No further action is recommended at this time.

SWMU 7 **Lead Dross Drum Storage Area**

Conclusions: The unit is located in the plant approximately 30 feet from the Satellite Lead Dross Drums (SWMU 6). The drums are stored on the concrete floor in an area away from the aisles where the moving equipment travels. There are no documented releases from this unit. The unit has a low potential for release to ground water, surface water, air, and on-site soil.

Recommendations: No further action is recommended at this time.

SWMU 8 **Roll-Off Container for Waste Storage**

Conclusions: The roll-off type container is about 30 cubic yards in capacity and is mainly used for storing compound containing lead. This container is constructed entirely of steel and all joints are seam-welded to prevent leakage. This container rests on an asphalt driveway (next to loading dock). Before this container is removed for off-site disposal, it is properly covered with a plastic cover and tied down in order to prevent any fall-out during transport. There

are no documented releases from this unit. The unit has a low potential for release to ground water, surface water, air, and on-site soil.

Recommendations: No further action is recommended at this time.

SWMU 9 **Lead Filter Drum Storage Area**

Conclusions: This area is located inside the plant (west side) next to the lead collection (filter) system. The used lead filters are stored in 55-gallon drums which rest on a concrete floor. Upon removal, the drums are delivered to the Hazardous Waste Drum Storage Area (SWMU 1). There are no documented releases from the unit. The unit has a low potential for release to ground water, surface water, air, and on-site soil.

Recommendations: No further action is recommended at this time.

SWMU 10 **Satellite Waste Paint/Solvent Sludge Drums**

Conclusions: These drums are located in the main plant alongside, or close to, the production line and rest on a concrete floor. This waste is collected from parts cleaning containers, cable wash, and paint dilution areas. The spent toluene is collected in closed 55-gallon drums in which a funnel is used to transport the material into the drum. There are no documented releases from this unit. The unit has a low potential for release to ground water, surface water, air, and on-site soil.

Recommendations: No further action is recommended at this time.

SWMU 11 **Copper Mud/Spent Oil Drum Storage Area**

Conclusions: This unit is located in a separate building on the south side of the main plant. The waste is stored in 55-gallon drums on skids, which rest on a concrete

floor. The copper-mud is taken off-site for reclamation. The spent oil is to be utilized in a waste fuel oil furnace to heat this same building during the winter months. There are no documented releases from this unit. The unit has a low potential for release to ground water, surface water, air, and on-site soil.

Recommendations: No further action is recommended at this time.

SWMU 12 **Satellite Waste Wire Drums**

Conclusions: There are approximately 15 drums located in various parts of the main plant. These drums rest on the concrete floor. The waste consists of cut-offs from the beginning and the end of various operations. This material is removed directly off-site for reclamation. There are no documented releases from this unit. The unit has a low potential for release to ground water, surface water, air, and on-site soil.

Recommendations: No further action is recommended at this time.

SWMU 13 **Waste Asbestos Storage Area**

Conclusions: The waste asbestos was removed from boilers, steam pipes, and other boiler appurtenances, and stored in containers. The boiler room is located behind the main office building. The unit is inactive, and there are no documented releases from this unit. No potential exists for release of hazardous constituents to environmental media from this unit.

Recommendations: No further action is recommended at this time.

REFERENCES

Anaconda-Ericsson, Inc. (A-E, Inc.), 1980a. Notification of Hazardous Waste Activity, August 11.

A-E, Inc., 1980b. Notification of Hazardous Waste Activity, October 31.

A-E, Inc., 1980c. Hazardous Waste Permit Application, November 16.

A-E, Inc., 1982. Revision to Part A Permit Application, February 24.

A-E, Inc., 1983. Revision to Part A Permit Application, February 4.

Anaconda Power Cable Co. (APCC), 1985. Revision to Part A Permit Application, March 21.

Anaconda Wire & Cable Co. (AWCC), 1985. Letter of request for disposal of asbestos, January 10.

Cablec Continental Cablec Company (CCCC), 1991a. Letter to IDEM requesting closure extension, March 11.

CCCC, 1991b. Cablec Continental Cables Company Facility Layout, June 20.

CCCC, 1991c. Modified Closure Plan, September 6.

CCCC, 1991d. Letter submitted to IDEM of modified closure plan, September 12.

CCCC, 1991e. Phone discussion with Brad Rusk (CCCC) and Arthur Marshalla (RAI), Re: Approximate annual weight of wastes for 1991. Also fax material sent to Arthur Marshalla regarding manifest from 1991 indicating transporters names and delivery sites for waste materials, December 19.

CCCC, 1992a. Phone conversations between Art Marshalla (RAI), Robert Lamb (CCCC) and Brad Rusk (CCCC) in reference to kolene salts, cooling tower spills, and the Wastewater Treatment Unit (SWMU 4), and NPDES permit, January 8.

CCCC, 1992b. Phone conversation between Art Marshalla (RAI) and Brad Rusk (CCCC) is reference to toluene and paint sludge, xylene, wastewater drawing solution, tinning pot, asbestos, Quonset hut, and battery reclaimers names, January 13.

Cablec Industrial Cable Co. (CICC), 1987a. Revised Notification of Hazardous Waste Activity, August 10.

CICC, 1987b. Revision to Part A Permit Application, October 22.

CICC, 1988a. Revision to Part A Permit Application, February 25.

CICC, 1988b. Closure Plan Submittal, September 28.

City Water Works (CWW), 1991. Arthur Marshalla (RAI) discussed ground information with City Water Works superintendent (Mr. Roger Pettijohn) by telephone, December 30.

Hartke, Edwin J., 1982. Environmental Geology of Grant County, Indiana, An Aid to Planning, Department of Natural Resources, Geological Survey Special Report 23.

Indiana Department of Environmental Management (IDEM), 1979. Letter to IWDC granting approval, on a one-time-only bases, to dispose of the kolene salts, July 18.

IDEM, 1987. Financial Assurance Record Review (Notice of Violation) March 20.

IDEM, 1991a. Letter to Cablec Corporation in reference to a 1990 Demonstration of Financial Liability, January 16.

IDEM, 1991b. Letter to Cablec Corporation stating its compliance, March 7.

IDEM, 1991c. Letter to CCCC granting an extension of the closure, April 22.

IDEM, 1991d. Notice of Violation and proposed Agreed Order for CCCC, September 3.

Indiana Department of Natural Resources (INDNR) 1968. "Water Resources in Grant County, Groundwater Availability", published by the State of Indiana, Department of Natural Resources, Division of Water, 1968.

Indiana State Board of Health (ISBH), 1985. Letter granting permission to dispose of asbestos, January 31.

Marion, Indiana, City Engineer, 1991. Discussed flood plain information with City Engineer (Mr. Michael Spyers) by telephone, December 27.

National Oceanic & Atmospheric Administration (NOAA), 1980. Climatography of the United States No. 20, Marion, Indiana.

U.S. Department of Agricultural (USDA), 1986. Soil Conservation Service, Soil Survey of Grant County, Indiana.

U.S. Department of Commerce (USDC), 1968. Climatic Atlas of the United States. U.S. Printing Office, Washington, D.C.

U.S. Geological Survey (USGS) 1981. Marion Quadrangle, Indiana - Grant County 7.5 minutes Series (Topographic).

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IN	IND 062 803 697

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER			
Cablec Continental Cables Company (CCCC)	440 East 8th Street			
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 COUNTY**	**07 COUNTY CODE**	**08 CONG DIST**
Marion	IN	46953	Grant		

09 COORDINATES: LATITUDE 40 02 10.N | LONGITUDE 085 37 30.W

10 DIRECTIONS TO SITE *(Starting from nearest public road)*

Route 18 (4th Street in Marion) and south on Shunk St. to Main Gate and Main Office.

III. RESPONSIBLE PARTIES

01 OWNER *(if known)*	02 STREET *(Business, mailing residential)*		
BICC Cables Corporation	One Crossfield Avenue		
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 TELEPHONE NUMBER**
West Nyack	NY	01994-1100	( )
07 OPERATOR *(If known and different from owner)*	**08 STREET** *(Business, mailing, residential)*		
Cablec Continental Cables Company (CCCC)	440 East 8th Street		
09 CITY	**10 STATE**	**11 ZIP CODE**	**12 TELEPHONE NUMBER**
Marion	IN	46953	(317) 668-0547

13 TYPE OF OWNERSHIP *(Check one)*

☐ A. PRIVATE ☐ B. FEDERAL: _____ *(Agency name)* ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☒ F. OTHER Corporation *(Specify)* ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*

☒ A. RCRA 3010 DATE RECEIVED: 08 / 11 / 80 (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: / / (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

☒ YES DATE 12 / 11 / 91

☐ NO

BY *(Check all that apply)*

☐ A. EPA ☒ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR

☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ *(Specify)*

CONTRACTOR NAME(S): Resource Applications, Inc.

02 SITE STATUS *(Check one)*

☒ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION

1980 (BEGINNING YEAR) | Present (ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Hazardous wastes handled by CCCC include copper mud, wastewater drawing solution, kolene salts, lead, xylene, paint sludge, stoddard solvent, toluene, waste paint, hydrochloric acid, perchloroethylene, MEK, mineral spirits, waste drums, used batteries, copper wire, spent oil and asbestos.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

In-plant releases of toluene vapors to atmosphere.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*

☐ A. HIGH *(Inspection required promptly)* ☒ B. MEDIUM *(Inspection required)* ☐ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*			03 TELEPHONE NUMBER
Kevin Pierard	EPA Region 5			(312) 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT	**05 AGENCY**	**06 ORGANIZATION**	**07 TELEPHONE NUMBER**	**08 DATE**
Arthur Marshalla	U.S. EPA	Resource Applications, Inc.	(312) 332-2230	12 / 10 / 91 (MONTH DAY YEAR)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
IN	IND 062 803 697

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES *(Check all that apply)*

- ☒ A. SOLID
- ☒ B. POWDER, FINES
- ☒ C. SLUDGE
- ☐ D. OTHER _____ *(Specify)*
- ☐ E. SLURRY
- ☒ F. LIQUID
- ☒ G. GAS

02 WASTE QUANTITY AT SITE *(Measures of waste quantities must be independent)*

TON _____

CUBIC YARDS Unknown

NO. OF DRUMS _____

03 WASTE CHARACTERISTICS *(Check all that apply)*

- ☒ A. TOXIC
- ☒ B. CORROSIVE
- ☐ C. RADIOACTIVE
- ☐ D. PERSISTENT
- ☐ E. SOLUBLE
- ☐ F. INFECTIOUS
- ☐ G. FLAMMABLE
- ☒ H. IGNITABLE
- ☐ I. HIGHLY VOLATILE
- ☐ J. EXPLOSIVE
- ☒ K. REACTIVE
- ☐ L. INCOMPATIBLE
- ☐ M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE	10,725	Pounds	Est. for Annual quantity listed on Form F of the ISBH - 1985
OLW	OILY WASTE	4,950	Pounds	Est. for Annual quantity listed on Form F of the ISBH - 1985
SOL	SOLVENTS	34,310	Pounds	Est. for Annual quantity listed on Form F of the ISBH - 1985
PSD	PESTICIDES	26,250	Pounds	Est. for Annual quantity listed on Form F of the ISBH - 1985
OCC	OTHER ORGANIC CHEMICALS	3,300	Pounds	Est. for Annual quantity listed on Form F of the ISBH - 1985
IOC	INORGANIC CHEMICALS	825	Pounds	Est. for Annual quantity listed on Form F of the ISBH - 1985
ACD	ACIDS	465	Pounds	Est. for Annual quantity listed on Form F of the ISBH - 1985
BAS	BASES	3,710	Pounds	Est. for Annual quantity listed on Form F of the ISBH - 1985
MES	HEAVY METALS	825	Pounds	Est. for Annual quantity listed on Form F of the ISBH - 1985

IV. HAZARDOUS SUBSTANCES *(See Appendix for most frequently cited CAS Numbers)*

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
D001	Waste Paint Sludge	F002/D001	S01		
	Waste Solvent N.O.S.	D001	S01/T63		
	Spent Toluene	F005	S01/T63		
	Waste Paint	D001	S01/T63		
	Spent Perchloroethylene	F002	S01/T63		
	Spent MEK F005	S01			
	Waste Mineral Spirits	D001	S01		
	Spent Xylene	F003	S01		
	Waste Hydrochloric Acid	D002	S01		

V. FEEDSTOCKS *(See Appendix for CAS Numbers)*

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

U.S. EPA Compliance and Inspection files, Indiana State Board of Health (Form F, State Form 19287).
VSI of CCCC, meeting with personnel of CCCC and subsequent telephone conversations.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
IN	IND 062 803 697

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None identified.

01 ☐ B. SURFACE WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None identified.

01 ☐ C. CONTAMINATION OF AIR — 02 ☐ OBSERVED (DATE: ___) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _ — 04 NARRATIVE DESCRIPTION

None identified.

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None identified.

01 ☐ E. DIRECT CONTACT — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None identified.

01 ☒ F. CONTAMINATION OF SOIL — 02 ☒ OBSERVED (DATE: Prior to 1980) ☐ POTENTIAL ☐ ALLEGED

03 AREA POTENTIALLY AFFECTED: 3,600 sq. ft. *(Acres)* — 04 NARRATIVE DESCRIPTION

Hazardous Waste Drum Storage Area (SWMU 1) had releases. Testing of the ground soil showed concentrations above-background of: barium, chromium, lead, benzene, tetrachloroethane, 1,1,1-trichloroethane, and chloromethane.

01 ☐ G. DRINKING WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None identified.

01 ☐ H. WORKER EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 WORKERS POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None identified.

01 ☐ I. POPULATION EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None identified.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
IN	IND 062 803 697

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ K. DAMAGE TO FAUNA — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION (Include name(s) of species)

None identified.

01 ☐ L. CONTAMINATION OF FOOD CHAIN — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None identified.

01 ☐ N. DAMAGE TO OFF-SITE PROPERTY — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPS — ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

None identified.

III. TOTAL POPULATION POTENTIALLY AFFECTED: __

IV. COMMENTS

Closure to this date has not been completed.

V. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

Cablec Modified Closure Plan, Dated September 6, 1991.

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Cablec Continental Cables Company (CCCC)
Marion, Indiana
IND 062 803 697

Date:	December 2, 1991
Facility Representatives:	Robert Lamb, Plant Manager 317/668-0626 Brad Rusk, Facilities/Project Engineer 317/668-0741 Myles D. Berman, Altheimer & Gray (Attorney) Roy O. Ball, Ph.D., P.E., ERM-North Central, Inc.
Inspection Team:	Arthur Marshalla, Resource Applications, Inc. (RAI) Jeff Indeck, Resource Applications, Inc. (RAI)
Photographer:	Arthur Marshalla, Resource Applications, Inc. (RAI)
Weather Conditions:	Calm, overcast, temperature about 40°F
Summary of Activities:	The visual site inspection (VSI) began at 9:00 a.m. with an introductory meeting. The inspection team discussed the purpose of the VSI and the agenda for the visit. Facility representatives then discussed CCCC's past and current operations, solid wastes generated, and release history. Most of the information was exchanged on a question-and-answer basis. CCCC representatives provided the inspection team with copies of documents requested. The VSI tour began at 2:00 p.m. Mr. Lamb discussed specific operations of each area as we walked through the production areas. The inspection began on the outside of the main plant at the northeast corner. We then entered the plant and went through the entire production line from the wire draw system, to the wire foundry, to wire insulation (including cabling) and finally to shipping. The SWMUs observed during the inspection were generally clean and well maintained. The tour concluded at 5:00 p.m., after which the inspection team held an exit meeting with CCCC representatives. The VSI was completed and the inspection team left the facility at 6:30 p.m.

Photograph No. 1 Location: SWMU 1
Orientation: East Date: 12/11/91
Description: Fenced in area (constructed of a curbed concrete pad) with a double gate entrance.

Photograph No. 2 Location: SWMU 1
Orientation: Southeast Date: 12/11/91
Description: Stacked waste drums organized by signs showing types of wastes.

Photograph No. 3 Location: SWMU 1
Orientation: Southwest Date: 12/11/91
Description: Concrete pad discoloration indicating a past spill (also note cracks in the pad).

Photograph No. 4 Location: SWMU 1
Orientation: South Date: 12/11/91
Description: Trenching done alongside of the SWMU (part of the remediation).

Photograph No. 5
Orientation: West
Description: Trenching done alongside of the SWMU (part of the remediation).

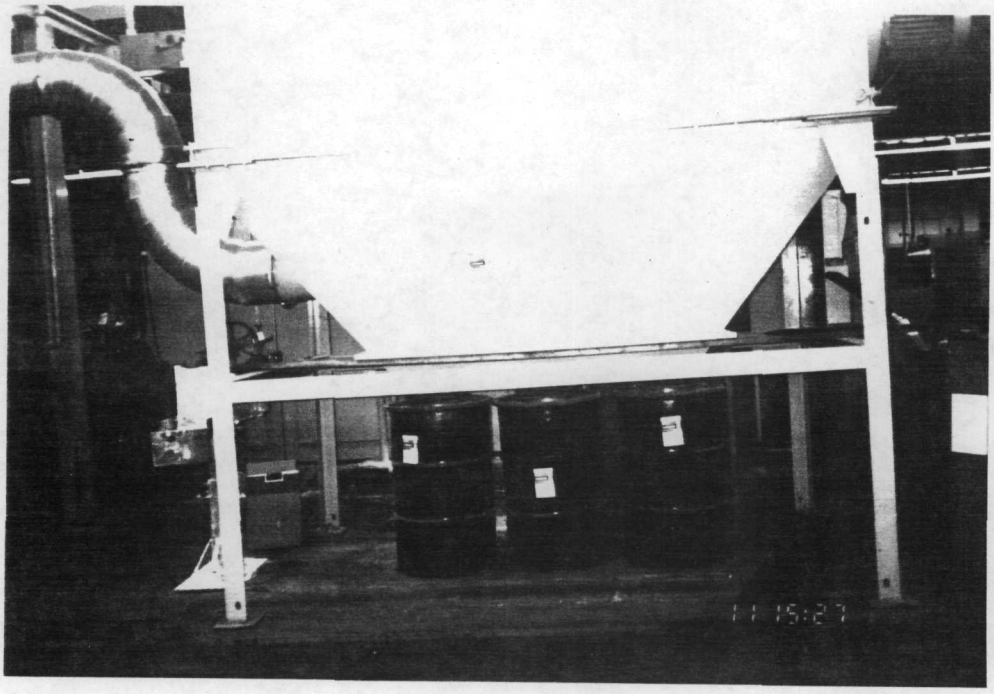
Location: SWMU 1
Date: 12/11/91

Photograph No. 6
Orientation: Southeast
Description: Former hazardous waste storage area.

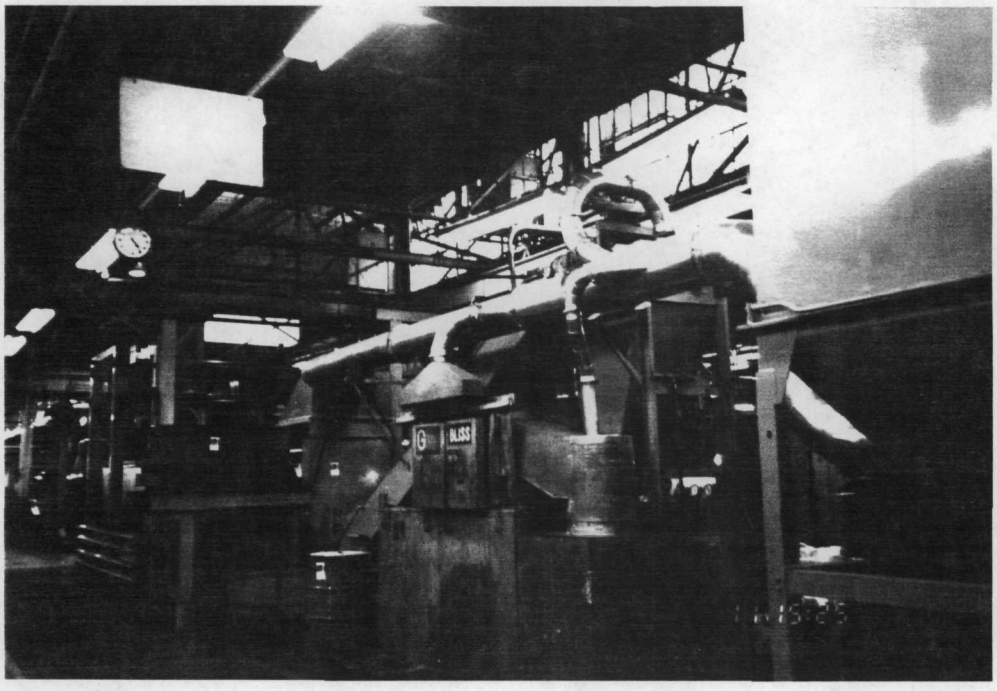
Location: SWMU 2
Date: 12/11/91

Photograph No. 7 Location: SWMU 3
Orientation: Northeast Date: 12/11/91
Description: Quonset hut-type building (upper right hand corner of photo) used for storage of empty waste drums and batteries.

Photograph No. 8 Location: SWMU 4
Orientation: Southeast Date: 12/11/91
Description: Cooling tower for wastewater treatment.



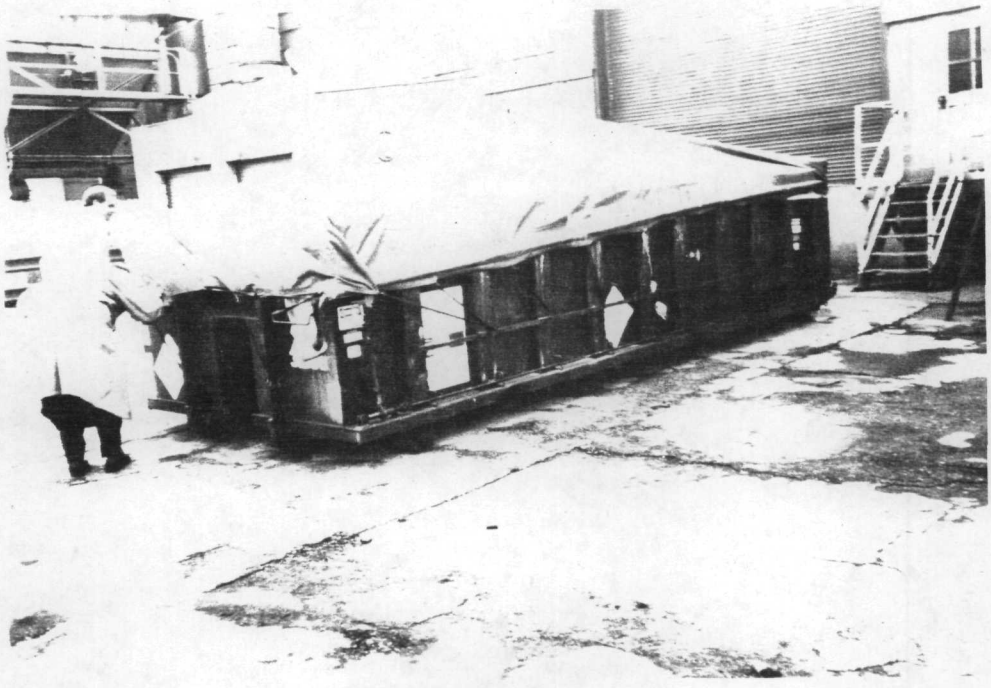
Photograph No. 9 Location: SWMU 5
Orientation: South Date: 12/11/91
Description: Lower half of baghouse with three collection drums for lead waste.



Photograph No. 10 Location: SWMU 6
Orientation: East Date: 12/11/91
Description: Satellite Lead Dross Drums area.

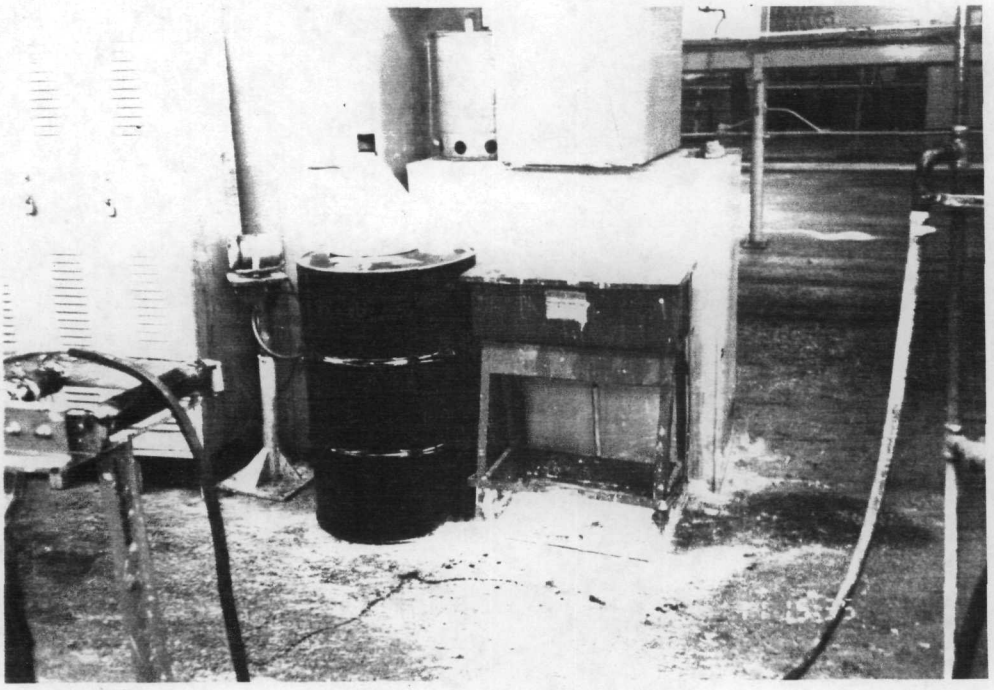
Photograph No. 11 Location: SWMU 6
Orientation: West Date: 12/11/91
Description: Satellite Lead Dross Drums area.

Photograph No. 12 Location: SWMU 7
Orientation: North Date: 12/11/91
Description: Storage area for a Lead Dross Drum after it is removed from its satellite area.

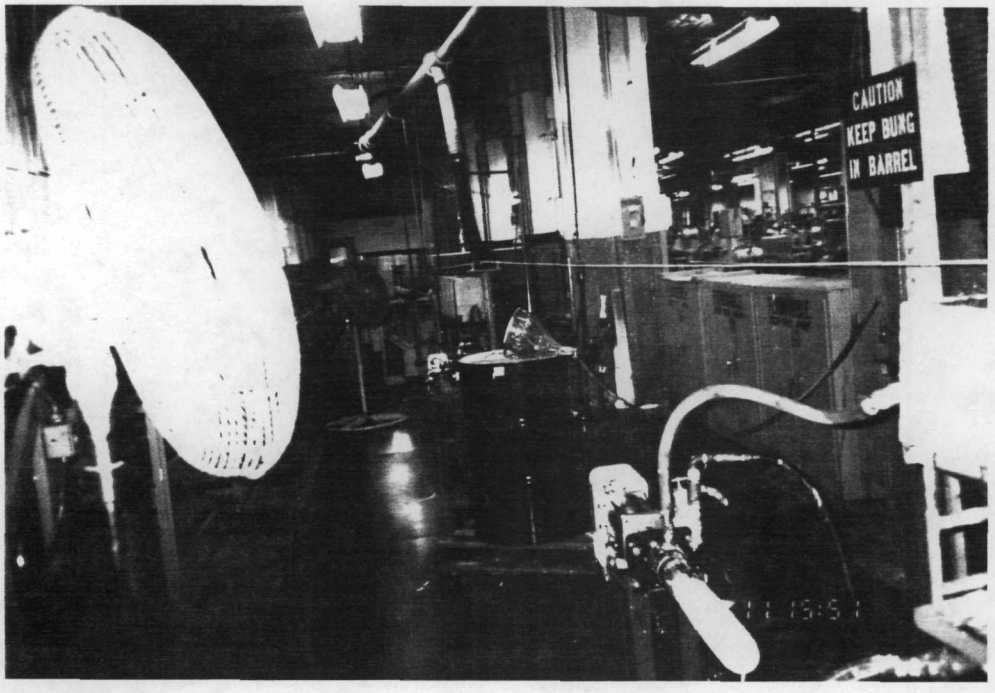


Photograph No. 13 Location: SWMU 8
Orientation: Southwest Date: 12/11/91
Description: Covered roll-off container storing waste lead compound ready for pick-up.

Photograph No. 14 Location: SWMU 9
Orientation: South Date: 12/11/91
Description: General satellite area for Satellite Lead Filter Drum Storage.



Photograph No. 15 Location: SWMU 10
Orientation: South Date: 12/11/91
Description: Toluene Cleaner Waste Drum Storage located next to toluene Parts Cleaner.



Photograph No. 16 Location: SWMU 10
Orientation: East Date: 12/11/91
Description: Toluene Cleaner Waste Drum Storage located in insulating area.

Photograph No. 17 Location: SWMU 11
Orientation: East Date: 12/11/91
Description: Reclaimed copper mud, spent oil, and virgin oil drum storage area (spent oil is used in heating furnace to heat building).

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

[illegible]

Evan Rusk – Env. Coord.

Ownership BICC → BCCC Nov 90

Industrial Wire Div

Cablec Continental

BICC is parent / ~~owner~~ is

Cablec Continental is Owner/Oper-

BICC Cablec NA.

BCC & BCCC are same

310 employees 251 production.

37 acres 660,000 sq ft [illegible] (inc.

Wells N of Prop. Inactive. 1/8 mi [illegible]

City owned / Back up.

Power Transfer Cable – Electrical

Transfer electricity.

Low voltage to med. 65 – to 35

=

Process.

Copper rod purchased

Draw to smallers size 5/16 → [illegible]

Stranding – One central wire & wrap wire. [illegible]

Bunching – Not done.

Stranding – Winding. Light Lube Oil.

Insulation Process – Raw mat. Injected, Accurate

Waste Insulation – Rubber mostly [illegible]

Steam / Salt / Lead Cure – Varies.

[illegible] must meet consumer [illegible]

May have Tin coat
4 elec
& corrosion
coats improve
elec chars
Only tin
Always use
99 [illegible] tin

Lead [illegible] with [illegible] [illegible]
water accumulated [illegible] [illegible] [illegible]
Cool Towers [illegible]
Water Discharge to Sewer [illegible] [illegible]
Use City if Possible
Lead to Air Monitored for emission [illegible]
[illegible] release used as Jacket [illegible]
Connect to Bag House
Interior Baghouse Lead to Filter

NPDES Volume Ties to Production
Storm Tied to Process Water
Monitored by Mun/[illegible]. Facility Bi-Week
Marion Utilities - Water and Sewage

Jacked Legend. Added to outside.
Individual Cables are stranded in Cabling.
Essentially same Process.

J.I.

3? - FIRE WATER
3C - COOLING TOWER FOR LEAD CA
3? - COOLING TOWER TO RECLAIM
72 - CORNER STANDBY FUEL OIL
ABOVE GROUND TANKS.

CITY PLANT TO NORTH
R.R. TO WEST / CONSTRUCTION
RIVER TO S & E.

SECURITY FLEX - LEAD

VEHICLE MAINT. IN BLDG 24.

NPDES OUTFALL 001 @ 006 FROM

DRAWING COMPOUND 95% H_2O 5% ANIMAL FA
CLOSED LOOP SYSTEM.
SOLIDS PRECIP OUT. COPPER SLUDGE RECLAIME
INTO 55-g DRUM. DRUM TO STORAGE AREA-
STORAGE AREA IS NON HAZ
BY cooling TOWERS.

PRINTING INK - MIXED & USE AS CRUDE PRODUC

..CING W/ RR WHEEL SMALL CO

=

Copper Sludge - Max .55 g/wk

ABRASION LOSS

RECLAIMER HAULS AND TRANSFERRED TO DIS

HIGH BIDDER

NO OTHER METAL PREP

STRANDING - MECHANIC NO WASTE GENERATE

INSULATION - EXTRUDED OVER/AROUND CABLE(S).

CURING COAT/JACKET

LEAD RECYCLED -

SALTS REUSED.

STEAM IS CONTACT TO JACKET TO REC

WWT - pH ADJUST TANKS THRU FILTER -

SMALL CLOSED SYST

CAUSTIC SODA. SODIUM HYDROXIDE.

≙ pH ADJUST 7 MOS.

Acid waste as maint. No Acid Ag Area. Gen as

Monitored at OUTFALL 006. JUST PRIOR -

Lead .15 month Avg .30 daily Max. T.T.

Cu pH.

- TOLUENE STREAM -
TOLUENE - CLEANING SOLVENT PRIOR TO SHIP -
T - PAINT - TO COLOR CABLE 1, 2, 82
VERY SMALL VOLS
KEPT SEPARATE
- PETRO CHEM BROKERS USES SOME -
- MANIFESTS.
PAINT ON PAINT CHIPS.
STOD. SOLVENT QA LAB & CLEANSING.
1 DRUM / YEAR
NOT IN PROCESS.
BROKERED & TOLUENE PETRO CHEM < 9 MOS
CHEM LOK - ANTI STICK.
FOR EASE OF STRIPPING GUM SHEETS.
TCE & XYLENE -

NO PERC USED.

RCRA HWSA
NON HAZ WASTE STORE AREA
PENDING W BLUE BEHIND DOCK
REFUSE & TRASH COMPACTER.
UNKNOWN SINCE WHEN. DUMPSTER O.F.

PERL ETC USES AS A CONSTANT
WITH METAL SHEATH

NaOH USED TO PH ADJUST NEW SYSTEM

SULFURIC ACID - CLEAN MACHINERY
DE LIMING

NO INFO ABOUT SOLIDIFIER ADHESIVE

APEX - DRAWING GOOP - NOW ANIMAL FAT ?

NO HCl IN TOWER WORK.

S.A.S. 4 -
CABLE FAB - 55 g
INSULATING - 55 g
SEL FLEX - 55 g
UN. SHIELD. - 55-g
HIGH VOLT. NOT USED.

AGE of USE ? 1 YEAR
HV AREA NOT IN USE > 1 YEAR

J.E.

[illegible] [illegible] MANAGED [illegible] [illegible] UNITS

AS BLEED OUT / BLEEDER
GENERATES IN START OF EXTRUDER [illegible]
TRANSFERRED TO ROLL OFF
ROLL OFF IS BEHIND H.V. COMPAC[illegible]
20 - C.Y
USED AS A MANAGEMENT AREA / YE[illegible]
1 YEAR - AREA IS USED & MANAGING
MANAGED AS NON HAZ > 1 YEAR
USED TO GO TO COMPACTOR

STEEL & LINES. ASPHALT.

COMPACT - 20 OR 30 YD
BEHIND ROB DOCK
MANAGES only NON HAZ
ON CEMENT ON TOP OF ASPH
BOXES, WOOD GENERAL REFUSE.
MAYBE 2/95 SINCE ACQUIRE PROP J.[illegible]

- LARGE TANKS FOR [illegible] FUEL -- #2
  STEEL WALLED, CEMENT MOAT
  START-UNK [illegible] NOT EVER BEEN FILLED.
  250,000 gallons.

BOILER - BESIDE
  2 TANKS STEEL 20,000 EACH.
  STILL IN USE [illegible] SUPPLEMENTAL FUEL #2

DRAWING SOLUTION - ANIMAL
  ABOVE GROUND - MILL AREA.
  NON HAZ.

LUBRICATING OILS.
  IN NEW BLDG. ON SOUTH PROP.

WASTE 1,000 A.G.
  MOBIL UNIT
  INACTIVE > 1 YEAR

RCRA STORE UNIT
  GOING THRU CLOSURE

LV STORAGE
  PRODUCT 500-g A.G.

H.V. STORE 500 g A.G.

J.I.

WAREHOUSE [illegible] ROOM [illegible]
DRUM

GASOLINE STORE

RECEIVING / DRUMS

MOST PRODUCT IS IN 55-g DRUMS.

SINGLE AND DUPLEX STORAGE
ALL AN PRODUCT

[illegible]

[illegible]

[illegible] WELLS AT PUMP HOUSE [illegible]
[illegible] TO NORTH

[illegible] OUT DUMPSTER W OF [illegible]
NE CORNER 20 YD BOX
COVERED AND LINED W/ [illegible]
ON ASPHALT.
1/4 MILE TO STREAM
NO DRAIN IN LOT. DRAIN IN LOT [illegible] DRAIN [illegible]
PUMP TO [illegible]. LABELED AS [illegible]. NO DATE

6 [illegible] OUTFALL IN LOT.
2 DUMPSTERS.

2 250,000 GALLON FUEL TANK CEMENT
BERM 3-4' HIGH
STEEL. MAY NOT HAVE BEEN USED.

POWER STATION

HAZ WASTE AREA
DRAINS TO DRAIN IN NE CORNER
DRAIN CLOSED CAN IS
LABELS ARE IN ORDER [illegible]
DRUMS ON PALLETS

J. [illegible]

[illegible] [illegible] SIZE [illegible]
[illegible] DRAINS [illegible]
SOME MINOR STAINING
ATTEMPT HAS BEEN MADE TO SEAL [illegible]
[illegible] TO ALLOW ACCESS [illegible]
[illegible] IN SW CORNER
MINOR ETCHING.

EMERG RESPONSE EQUIP [illegible]

SS Report shows HAZ WASTE STORE AREA
[illegible]
USE TO STORE < 90 DAYS [illegible] DAYS.
DAILY INSPECTION
DRUMMED WASTE
VOL: / CHARACTER:

NON HAZ WASTE STORED IN NON HAZ AREA
WATER JUST OFF PROP TO SOUTH. [illegible]

EMPTY BARRELS IN QUONSET HUT
STORED ON PALLETS.

BATTERIES STORED IN QUONSET HUT
TWO ON SITE OVER CEMENT
[illegible]

J. I.

[illegible]

=

[illegible] OFF OF CEMENT [illegible]
LABORATORY [illegible]
[illegible] COOLER
WASTE [illegible]

=

[illegible] THIS NUMBER IN [illegible] OF [illegible]
MUST ACCEPT TO [illegible] & SENT TO [illegible]

=

WWT - BLOWDOWN TOWER
If [illegible], [illegible] in BLDG W of [illegible]
Outfall [illegible] behind Blowdown Tower.
Pumphouse W of WWT.

=

Copper sludge and virgin Oil in Bld
W of Pumphouse and WATER TANK

BUILDING 6-7 mos OLD
BUILDING OVER COMPACTOR

SPENT OIL ALSO STORED IN COPPER MUD BLDG.
Copper sent to Reclaimer in Texas.
DRUMS. STORED ON PALETS.
WAIT UNTIL ENOUGH DRUMS
Will add furnace to waste MINIMIZATION.

J.E.

[illegible]

ALL WASTE WIRE SCRAPES FOR RECYCLER
Managed in open 55-g DRUMS

LEAD DUST COLLECTION SYSTEM
AIR VENTED TO OUTSIDE
PARTICLES SETTLE INTO DRUMS.

LEAD WATER FILTERS FROM RECIRC
4 TOWERS
FILTERS REMOVED INTO DRUMS.

TOLUENE CLEANER IN DRUM 55 g - AS SAT AC[illegible]

ALSO PARTS WASHER - SOLVENT RELEASE [illegible]

LEAD DROSS IN 55-g DRUMS. IS SKIM[illegible]

ALL LEAD IS RECYCLED

TOLUENE / PAINT MIX IN DRUM AT SAT
INSULATING AREA.

J.

PRINT TOLUENE DATA SET TO BE
TO HAND TO DATA
WASTE TO SAM

QA LAB - TEST CHARTS OF PRODUCT
MAINTAINED ON FILE
SENT TO SCRAP RECYCLING

. 22 82 — ANACONDA WIRE AND CABLE CO RCRA 55 WASTE
GENERATE FLAMMABLE SOLVENT WASTE
TOLUENE, XYLENE, MINERAL SPIRITS, BLENDED SOL
COLLECTED DAILY TO FENCED PAD STORE AREA

1/7/82 — STATE HAZ WASTE FACILITY OPERATING PERMIT

3/19/82 — HAZ WASTE PERMIT APPLICATION BY ANACONDA ERIC
IGNITABLES - 9,000 POUNDS ANNUAL
CONTINGENCY PLAN & RCRA PAD
- HAZ WASTE STORE AREA. 50'x50' & 10" BERM
- WASTE OIL STORAGE FACILITY
- WASTE OIL RECOVERY SYSTEM

2/9/82 — PART A APPLICATION ANACONDA-ERICSSON,
NPDES, RCRA, OTHER-? 27-02-82-
NPDES OUTFALLS INACTIVE WELLS.

4/15/75 — COOLING TOWER WATER SEDIMENTS
TO LANDFILL & LIME
CONTAMINANT IS COPPER
FROM WIRE DRAW & ANNEALING OPS
HAS Cu, Cd, Cr, Pb J.I

WASTES GENERATED

58 BULIN / ANACONDA BLEND   SPENT SOLVENT

CHEMLOK - TCE & XYLENE

XYLENE

TOLUENE

PAINTS - CABLE PAINT : MEK / TOLUENE / PIGMENT

EXTENDER 112 - MIC / KETONES / PIGMENT

MINERAL SPIRITS

OAKITE - HCl ?

BLACKSTONE - HYDROXYACITIC ACID

59 SULFURIC ACID

57 PERCHLORETHYLENE

STODDARD SOLVENT

PERCHLORETHYLENE / METHYLENE CHLORIDE / PAH

J. :

9/2/91 AGREED ORDER - NOT EXECUTED
IS HISTORY CORRECT
WHAT IS RELATIONSHIP OF BICC TO CICC
BICC CABLES CORPORATION FORMERLY CICC
WHO IS CCCC? 9/20/91

10/91 EXECUTES AGREED ORDER
FINANCIAL RESPONSIBILITY

1/14/85 FINANCIAL DOCUMENTS FOR CABLEC

2/1/85 CABLEC PURCHASE FACILITY FROM ERICSSON, I

12/84 AGREED ORDER FOR FINANCIAL RESPONSIB
NOT EXECUTED.

6/25/87 NOV FOR FINANCIAL ASSURANCE VIOL

3/11/91 REMEDIAL DATA
CHLORINATED SOLVENTS & NON CHLOR
BARIUM CHROMIUM LEAD.

1/20/91 MODIFIES CLOSURE PLAN. - WHERE.

11/30/84 RCRA TSD INSPECTION TSD L.
J.I.

- Processes
Juice Cleaning - Gens Solvents & Acids
Deliming - Pickling? Gens Acid
Painting - Gens Paint/Toluene Mix & Tol.
Motor Cleaning - Gen's in past Degrease Sol.

WWT? Filters? Acid? Caustic?

FOO5 HES; McKesson Envirosystems.
FOO2 Incinerator - who?
FOO1 HES

Paint ink Drums are in storage area. Date Large

Waste Chemlok Sludge / Adhesive Sol's
T.C.

SE PLAN SHOWS 3 STORAGE AREAS

3 SPILLS

SPILLS LIKELY IN 12 AREAS

MOSTLY BULK STORAGE

6/31/81 APEX 99R + H_2O 3

11/25/81 APEX 99R - DRAWDOWN SOLN

12/20/81 MARLEY TOWER OVERFLO

UREA 3,000 g SULFACIA, CH

RCRA & SPCC INSPECTION FORM.

12 AREAS.

LAST IS 5/87.

SPILL PREV CONTROL & COUNTERMEASURE

3/17/89 89 CLOSURE PLAN REVISION

5 WASTE STREAMS.

S.I

1/20/90 INSPECTION

6 WASTE STREAMS — GREEN KLEEN
TOLUENE — SAFETY KLEEN
PAINT
FILTERS - LEAD? — ASBESTOS CEMENT
STODDARD SOLVENT — 4-K
CHEM LOK — INCINERATOR
NEOH / SULF ACID WWT

AMTS
SAA — CABLE SERV AREA
SECURITY FLEX AREA
INSULATING AREA
HIGH VOLTAGE DIV.
UNISHIELD LINE

2/12/90 INSPECTION MEMO — T.I.

ATTACHMENT D

SOIL SAMPLES ANALYTICAL RESULTS FROM HAZARDOUS WASTE DRUM STORAGE AREA (SWMU 1)

Figure 1

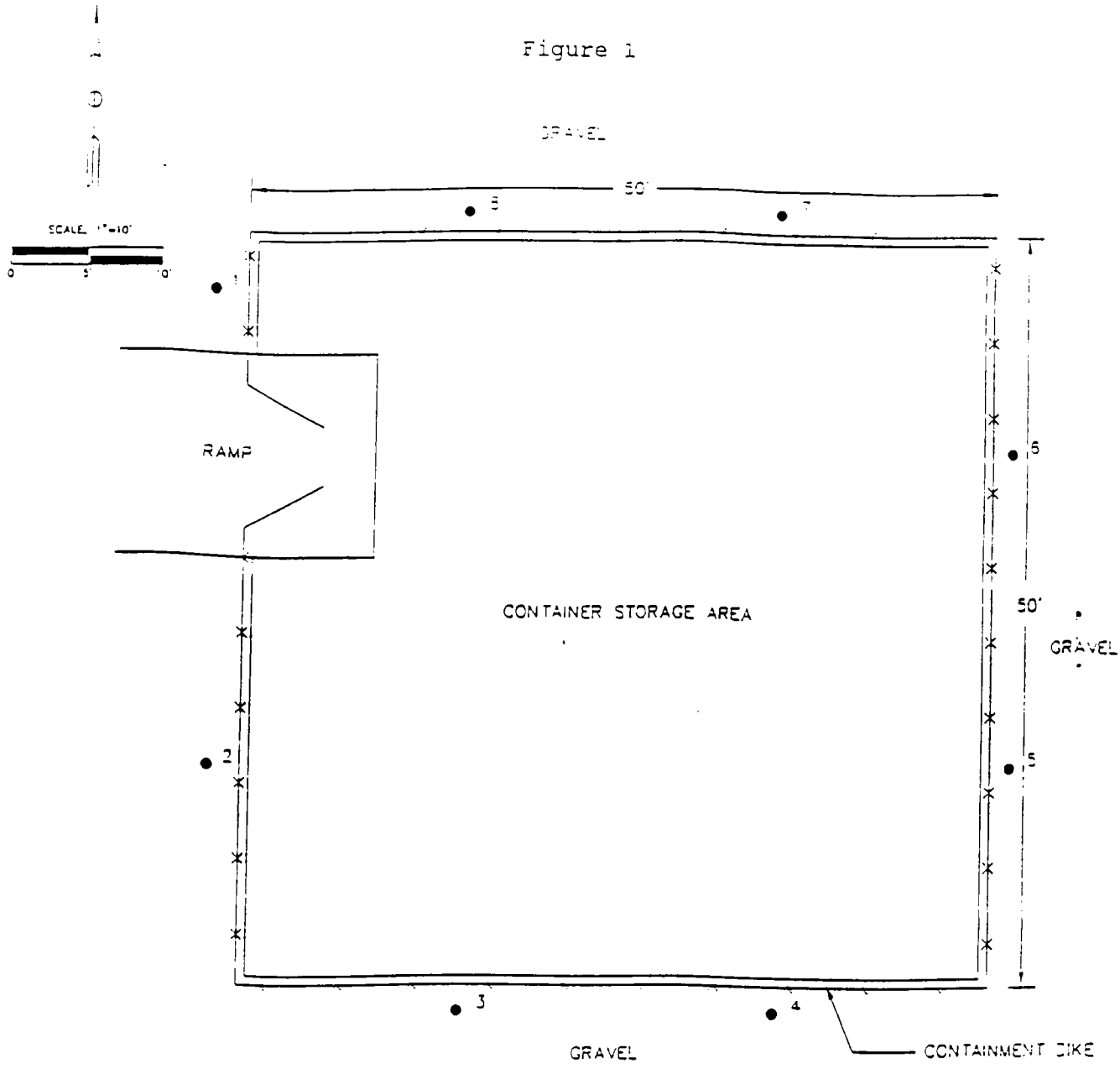


FIGURE 1

CABLEC INDUSTRIAL CABLE

MARION, INDIANA

SITE PLAN

● = SAMPLE LOCATION

HERITAGE

HERITAGE REMEDIATION/ENGINEERING, INC.

TABLE 1

SUMMARY OF RESULTS
INITIAL SOIL SAMPLING

CABLEC INDUSTRIAL CABLE
CONTAINER STORAGE PAD CLOSURE

(mg/kg)	1A	2A	3A	4A	5A	6A	7A	8A	B_1A	B_2A	B_3A	B_4A	3SD Above Mean Background
Arsenic	6	2.3	7.6	6.8	7.2	5.8	2.6	3.2	8.6	8.2	8.3	10	11.4
Barium	340	100	180	65	800	190	210	60	70	75	27	65	125
Chromium	9.5	10	13	9	20	5.5	8	6	9.0	9.5	7.0	10.0	12.8
Cadmium	4	2	5.5	4.0	11	10	3.5	3.0	5.0	4.0	10	5.0	14
Lead	340	190	230	32	330	140	65	33	80	85	70	65	102.4
Mercury	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.15	0.23	BDL	BDL	---
Selenium	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	---
Silver	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.80	BDL	BDL	2.0	---

mg/kg	1	2	3	4	5	6	7	8
Benzene	0.39	BDL	0.32	BDL	BDL	BDL	BDL	BDL
Tetrachloroethene	1.4	1.5	BDL	BDL	0.82	BDL	2.6	BDL
1,1,1,Trichloroethene	BDL	BDL	BDL	BDL	BDL	0.35	BDL	BDL
Chloromethane	BDL	BDL	BDL	BDL	BDL	BDL	0.49	BDL

TABLE 2

SUMMARY OF RESULTS
SECOND SOIL SAMPLING

CABLEC INDUSTRIAL CABLE
CONTAINER STORAGE PAD CLOSURE

mg/kg	1	2	3	5	6	7
Barium	230		380	140	55	110
Chromium			7.4	11		
Lead	80	25	120	200	16	

mg/kg	1	1 Dup	2	2 Dup	3	3 Dup	5	5 Dup	6	6 Dup	7	7 Dup
Benzene	BDL	BDL			BDL	BDL						
Tetrachloroethene	0.63	1.3	2.9	12			BDL	8.3			3.9	BDL
1,1,1 Trichloroethene									BDL	BDL		
Chloromethane											BDL	BDL

TABLE 3

SUMMARY OF RESULTS
THIRD SOIL SAMPLING

CABLEC INDUSTRIAL CABLE
CONTAINER STORAGE PAD CLOSURE

mg/kg	1	2	3	5	7
Barium	BDL		560	44	
Lead			180	27	
Tetrachloroethene	400	4.1	BDL	BDL	BDL
Trichloroethene			0.67		

BDL - Below Detection Limit

SD - Standard Deviation

Dup - Duplicate

See page D-5 for further explanation of Figure 1 and Tables 1, 2, and 3.

Explanations for Figure 1 and Tables 1, 2, and 3

Note: As indicated on the third paragraph of page 14 of this report, Figure 1 and Tables 1, 2, and 3 are a part of HR/Es report to Cablec Continental Cables Company (CCCC). The figure and tables were included in a letter dated March 11, 1991 from CCCC to IDEM. As can be seen, the figure is lacking some numbers (test points) indicated on the tables. In addition, the tables have some spaces with no numbers and some with dashes, i.e., without an explanation. Also some of the numbers are shaded, again without an explanation. We do not have any additional documentation to support these deficiencies. The company which wrote the report no longer works for CCCC. Based on a phone converstation between Art Marshalla (RAI) and Brad Rusk (CCCC) on February 6, 1992, the following assumptions were made: the shaded numbers mean that those samples failed to meet the requirements of the U.S. EPA and that the samples for this part of Table 1 were taken before remediation. We do not have an explanation for the blank spaces and the dashes. We also do not have another drawing indicating the additional sampling points. We do know that CCCC is still in the closure process.

SITE/INCIDENT FORM 1 (SEI) OVERRIDE: — U.S. E.P.A. SUPERFUND PROGRAM CERCLIS SITE INFORMATION FORM (SIF) — ENFORCEMENT SENSITIVE INFORMATION FOR INTERNAL USE ONLY

794

CABLEC CONTINENTAL CABLES COMPANY

SITE NAME: ________________ SSE RPM-OSC NAME/PHONE: ____/___/___-____

SITE ID NO: __________ FMS SITE/SPILL ID: ____ OTHER SSE CONTACT NAME/PHONE: ____/___/___-____

RCRA ID # IND062803697

ALIAS NAME(S):

*LATITUDE: 40 02 10 N

STREET: 440 EAST 8TH STREET

*LONGITUDE: 85 37 30 W

LL SOURCE: _

LL ACCURACY: _

*CITY: MARION

*COUNTY: GRANT

*** FEDERAL Facility Flag : N**

*STATE: IN

*** RCRA Facility Flag : E**

MAY 2 , 1993

*ZIP: 46953

CONGRESSIONAL DISTRICT:

*COUNTY CODE:

*SMSA: ____

USGS HYDRO UNIT: ________

NO FURTHER ACTION FLAG: _

DIOXIN TIER: ____________

SITE NAME SOURCE: _

AGGREGATE CASE BUDGET OBLIGATIONS: _________

AGGREGATE FUND OBLIGATIONS: TBD

*SITE/INCIDENT ABSTRACT: ________________________________

*SITE CLASSIFICATION: __

(NG) FUND LEAD/NEGOT
(FE) FEDERAL ENFORCEMENT
(VP) VOLUNTARY/NEGOTIATED RESP

(F) FUND LEAD/NO NEGOT
(SN) STATE NON-FUND
(LT) LIMITED TIME FOR NEGOTIATION

(SE) STATE ENFORCEMENT
(SF) STATE/FUND
(ND) NO DETERMINATION(DEFAULT)

207 MAY 1 8 1993 5/21/93 gl Fred S.P. 39479 Cathy 6-6214

---- DATA ELEMENT OR CODE ANY QUESTIONS? CALL CSC CERCLIS STAFF ACTION: A (CSC ONLY)

7/94

DS=

EVENT/SUBEVENT/FINANCIAL INFORMATION (EVT/SVT/FIN) 03/08/88

U.S. E.P.A. SUPERFUND PROGRAM
CERCLIS SITE INFORMATION FORM (SIF)

ENFORCEMENT SENSITIVE INFORMATIO
FOR INTERNAL USE ONLY

CABLE CONTINENTAL CABLES COMPANY

*SITE NAME: _____ S/I RPM-OSC NAME/PHONE: _____/(___)___-_
*EPA ID NO: _____ FMS SITE/SPILL ID: ____ EVENT REGIONAL CONTACT NAME/PHONE: _____/(___)___-_
OTHER REG CONTACT NAME/PHONE: _____/(___)___-_

RCRA ID# IND062803697

*OP UNIT *EVENT SUBEVENT_TYPE	*OP UNIT NAME *EVENT NAME *SUBEVENT_NAME	LEAD	<----START----> PLAN (MM/DD/YY)	*PLAN (FY/Q)	*ACTUAL (MM/DD/YY)	<---- COMPLETE ----> PLAN (MM/DD/YY)	*PLAN (FY/Q)	*ACTUAL (MM/DD/YY)	SPMS TARGET	SCAP_NOTE
00										
DS	Site Discovery	F	__/__/__	__/__	__/__/__	__/__/__	__/__	12-11-91 *	-	
___	_____	__	__/__/__	__/__	__/__/__	__/__/__	__/__	__/__/__	-	

*TAKEOVER FLAG: ___ *FIRST START: _ *FIRST COMPLETE: _

*EVENT QUALIFIER: _ *EVENT NPL INDICATOR: _ APPROVAL AUTHORITY: __

*RCRA OFF-SITE ID: _____; _____; _____; _____; _____; _____

COOPERATIVE AGREEMENT NUMBER: _____ COOPERATIVE AGREE. AMEND NO.: __ __ __ __ __ STATE X: ___

CERCLIS FINANCIAL DATA

*FIN SEQ NO.	*FMS ELG	*FIN BDGT TYPE	SRCE	*ACN	*OCN	*FIN BDT	*PLAN FYQ	*FIN DATE	*FIN VEHICLE	*CONTRACTOR	*FUND PRTY STAT	*FIN NOTE
___	-	-	-								___	
___	-	-	-								___	
___	-	-	-								___	
___	-	-	-								___	

SUMMARY FMS FINANCIAL DATA

FIN SRCE	*ACN	*OCN	NET COMMIT *BDT	ORIG COMMIT *DATE	NET OBL BDT	ORIG OBL *DATE	NET OUTLAY *BDT	LAST OUTLAY *DATE	FIN VEHICLE	CONTRACTOR	*FIN NOTE
___			___,___,___	__/__/__	___,___,___	__/__/__	___,___,___	__/__/__			

*CORE DATA ELEMENT OR CODE

4/8/93

IF ANY QUESTIONS? CALL CSC CERCLIS STAFF

ACTION: _____ (CSC ON

207 - 1 8 1993

Fred SP 39479